

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	18-CR-204(NGG)
	:	
-against-	:	United States Courthouse
	:	Brooklyn, New York
	:	
KEITH RANIERE,	:	Thursday, May 23, 2019
	:	9:30 a.m.
Defendant.	:	
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TRANSCRIPT OF CRIMINAL CAUSE FOR TRIAL
BEFORE THE HONORABLE NICHOLAS G. GARAUFIS
UNITED STATES SENIOR DISTRICT COURT JUDGE

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1 THE COURT: Let's wait for the Defendant.

2 (Pause in proceedings.)

3 THE COURT: Appearances.

4 MS. PENZA: Moira Penza, Tanya Hajjar, and Mark
5 Lesko for the United States. Good morning, your Honor.

6 Also at counsel table is Special Agent Michael
7 Wenniger with the FBI and paralegal specialist Teri Carby.

8 THE COURT: Good morning.

9 MR. AGNIFILO: Good morning, your Honor. Marc
10 Agnifilo, Teny Geragos, Paul DerOhannesian, Danielle Smith,
11 and Keith Raniere, all at defense table.

12 THE COURT: Good morning. You all may be seated. A
13 few things before we get to the next witness.

14 I received this morning a motion for a mistrial.
15 The motion is denied.

16 Also, I noticed more and more yesterday that there's
17 conversation going on at defense counsel's table between the
18 Defendant and one of his attorney. I find it distracting.
19 It's during witness testimony. I overheard a comment from the
20 Defendant while the witness was testifying. I think it's a
21 distraction for the jury.

22 If there's to be communication at counsel's table
23 during testimony, simply write a note, all right? That way,
24 there won't be any issue. I just want to avoid any problem
25 that might occur. During testimony, I'm saying; otherwise,

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1 you're free to talk all you want.

2 MR. AGNIFILO: Understood.

3 THE COURT: Also, the next witness is going to be
4 known by only her first name; is that right?

5 MS. PENZA: That's right, your Honor.

6 THE COURT: And I'm instructing any sketch artists
7 in the room that they are not to sketch the face of the
8 witness.

9 MS. PENZA: Your Honor, we may also be
10 introducing -- I expect we will introduce a photo of her
11 sister, who should also not be sketched, your Honor.

12 THE COURT: All right. I just wanted to share that
13 with the sketch artists who are here, and I know they will
14 follow the instruction.

15 Also, yesterday, there was some discussion with the
16 witness about the validity of a plea proceeding before me and
17 whether the witness had been disingenuous or lying to the
18 Court during that proceeding. The jury knew that the
19 proceeding was in front of me. It implicated the validity of
20 the proceeding.

21 If there's going to be any discussion of court
22 proceedings in which I am involved, I want an offer of proof
23 provided to me beforehand so that we can determine whether
24 this is something that is appropriately put in front of this
25 jury.

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1 So, this is just a warning about that kind of
2 questioning. I'm not saying the questioning can't go forward,
3 I just don't want to be at the surprised end of that kind of
4 inquiry where the issue is something that happened in my court
5 where I took a guilty plea and the person was under oath
6 before me and I accepted the guilty plea. So, just bear that
7 in mind.

8 Do you understand?

9 MR. AGNIFILO: I do. I can only think of it
10 happening possibly with one other witness.

11 THE COURT: I understand that. I'm just pointing it
12 out.

13 MR. AGNIFILO: I know.

14 THE COURT: I didn't tell you before this, so I'm
15 telling you now. Now that it's come up, I just want you to
16 understand that so there's no misunderstanding.

17 MR. AGNIFILO: Understood.

18 THE COURT: All right. Now we need a sidebar on two
19 issues that we need to resolve at sidebar.

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21 (Continued on the following page.)

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1 (Sidebar ends; in open court.)

2 THE COURT: Anything else before we proceed?

3 MS. PENZA: Not from the Government, your Honor.

4 THE COURT: Mr. Agnifilo, anything else.

5 MR. AGNIFILO: No, thank you.

6 THE COURT: Let's bring in the jury, please.

7 Do you expect the testimony of this witness will
8 take all day?

9 MS. PENZA: Absolutely, your Honor. Probably well
10 into Tuesday.

11 (Jury enters.)

12 THE COURT: Please be seated.

13 Good morning, members of the jury.

14 (A chorus of good mornings.)

15 THE COURT: We will now continue with the next
16 witness. You may call your witness.

17 MS. PENZA: The Government calls Daniela.

18 (Witness sworn.)

19 THE COURTROOM DEPUTY: Please have a seat.

20 THE COURT: You may inquire.

21 MS. PENZA: Thank you, your Honor.

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1 **DANIELA,**

2 called by the Government, having been

3 first duly sworn, was examined and testified

4 as follows:

5 DIRECT EXAMINATION

6 BY MS. PENZA:

7 Q Good morning, Daniela.

8 A Good morning.

9 Q How old are you?

10 A I am 33 years old.

11 Q What is your birthday?

12 A My birthday is October 26, 1985.

13 Q Where do you currently live?

14 A I live in Mexico.

15 Q Are you familiar with an organization called "NXIVM"?

16 A Yes.

17 Q When did you first become involved in NXIVM?

18 A In the year 2002.

19 Q How old were you then?

20 A I was 16.

21 Q For some number of years, were you connected to that
22 organization or to people affiliated with that organization?

23 A Yes, I was.

24 Q For how long?

25 A About ten years.

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1 Q And is that from approximately 2002 through March of
2 2012?

3 A Yes.

4 Q During that time, did you primarily live in the Clifton
5 Park, New York, area?

6 A Yes, I did.

7 Q Can you provide the first names of the members of your
8 medicine family?

9 A Yes. My father is Hector, my mother Ariana, my older
10 sister Marianna, my little brother Hector Adrian, and my baby
11 sister Camilla.

12 Q What is the age difference between you and your siblings?

13 A My sister Marianna is older than I am, we're two years
14 apart. Then my two younger siblings, they are one year apart,
15 two years apart from me. A six-year span.

16 Q Can you give each of their birthdays, please?

17 A Yes. Marianna's birthday is November 15, 1983; Hector
18 Adrian's birthday is September 24, 1988; and Cami's birthday
19 is March 1, 1990.

20 Q Are you familiar with someone named Keith Raniere?

21 A Yes, I am.

22 Q Do you see Keith Raniere in the courtroom today?

23 A Yes.

24 Q Can you identify him by an article of clothing he's
25 wearing?

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1 A Yes. He's wearing a dark red sweatshirt.

2 MS. PENZA: May the record reflect the witness has
3 identified the Defendant?

4 THE COURT: Yes.

5 MS. PENZA: Thank you.

6 Q At various points in time, has every member of your
7 immediate family also been connected to NXIVM or the
8 Defendant?

9 A Yes.

10 Q At some point, did the Defendant begin having sex with
11 you?

12 A Yes, he did.

13 Q How old were you?

14 A I was 18 years old.

15 Q Did he also have sex with your two sisters?

16 A Yes, he did.

17 Q During the time you were in Albany, were you in the
18 United States legally?

19 A Not for the entire period of time.

20 Q Can you describe which periods of time you were here
21 legally versus not legally?

22 A From the period from 2002, 2003 to 2004, I was coming in
23 and out legally. 2004 'til the end of my involvement, I was
24 in the United States illegally.

25 Q Is it fair to say that when you recall your experiences

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1 with NXIVM and with the Defendant that you divide it into
2 specific stages, there's kind of distinct stages to that?

3 A Yes. There's a few important milestones.

4 Q Would it be helpful to provide those for your later
5 testimony?

6 A Yes.

7 Q Can you provide those, please?

8 A Yes. So, after being involved in ESP, I would say the
9 first one is when Keith started having sex with me. That was
10 around my 18th birthday.

11 The next big event was when I crossed into the
12 United States illegally, which was 2004. It was around
13 Christmas 2004.

14 The next big event was when I had a fight with
15 Keith, and that was in 2006, late 2006.

16 And the last big event was when they put me in the
17 room, which would be 2010.

18 THE COURT: Which was what year?

19 THE WITNESS: 2010.

20 THE COURT: Thank you.

21 Q And just to establish it now, do you remember what month
22 that was in 2010?

23 A It was March 9.

24 Q And when did you leave the room?

25 A In 2012, late February.

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1 Q Let's go back to before you and your family had heard of
2 the Defendant.

3 Where were you born?

4 A I was born in Mexico.

5 Q And in what type of town were you born in?

6 A I am from a very small town in the center of Mexico. I
7 was actually born in the capital of the state, but my mother
8 just went there for me to be born, and I was really raised in
9 a very, very small town in the center of Mexico.

10 Q Can you describe what the town was like?

11 A Yes. The town was in the semi-desert. It was such a
12 small town there were no malls, no big supermarket chain, no
13 movie theaters. The community, even though there's quite a
14 bit -- a large population, our communities, we all knew each
15 other and all the activities that we were doing.

16 Q What did your parents do when you were growing up?

17 A My father had a business with his brothers in the field
18 of mining, manufacturing tools for rock drilling. Then he
19 went independent in the same line of business and started
20 acquiring a good degree of success. He was very good, he is
21 very good, at what he does.

22 My mom was a stay-at-home mom, which means she did a
23 lot of different things; not only take care of us, but she
24 also contributed selling little things.

25 Q How would you describe your childhood?

1 A My childhood was idyllic. It was perfect. We grew up in
2 a relatively-abundant financially setting. We went to private
3 school, we had English lessons, tennis lessons.

4 I had a degree of difficulty fitting into society,
5 into school, at the country club, but my family was my bubble.
6 My family was like the center of gravity. I felt safe.

7 So, growing up for the first 15 years, my older
8 sister was my best friend. I had a very good relationship
9 with my parents. I would say unusually good relationship with
10 my parents, perhaps later realized. They used to joke about
11 our family, saying that we were like the Flanders in The
12 Simpsons because we got along so well and it seemed so perfect
13 from the outside. And the truth is that from the inside, it
14 was a pretty wonderful way to grow up.

15 MS. PENZA: Your Honor, the Government would like to
16 move into evidence on consent Government Exhibits 912 through
17 923, Government Exhibit 925, Government Exhibit 926, and
18 Government Exhibit 929.

19 MR. AGNIFILO: No objection to that, your Honor.

20 THE COURT: All right. Government Exhibits 912 to
21 923, 925, 926, and 929 are all received in evidence on
22 consent.

23 (Government Exhibits 912 to 923, 925, 926, and 929
24 so marked.)

25 MS. PENZA: Thank you, your Honor.

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1 (Exhibit published to the jury.)

2 Q Daniela, I'm showing you what's already in evidence as
3 Government Exhibit 925.

4 Do you recognize this photo?

5 A Yes, I do.

6 Q Can you describe who's in the photo?

7 A From the back to the front, it's my dad and my mother, my
8 sister Marianna, then it's me, my little brother Hector
9 Adrian, and my baby sister Camilla.

10 Q Do you remember when this picture was taken?

11 A Yes.

12 Q When was it?

13 A This was the declaration of the shop where my father was
14 manufacturing his tools that he did for business.

15 Q Was that a happy day for your family?

16 A Very.

17 Q How old are you and your siblings in this photo?

18 A I think I was about ten years old, so Marianna would have
19 been twelve, and Cami and Adrian would have been, like, seven,
20 eight.

21 Q How close was your family at this time?

22 A At this time and throughout my entire childhood, we were
23 very close.

24 Q When you were a child, did you have dreams about what you
25 would be when you grew up?

1 A Yes, I had many dreams.

2 Q Can you describe those for us?

3 A Yes. So, they changed a little bit throughout my
4 childhood and I would call them more plans, not dreams.

5 When I was a little younger and I used to run around
6 with my microscope and my encyclopedia, I wanted to be a
7 biologist. I wanted to be -- I wanted to study the animals
8 and be a marine biologist and I wanted to join Greenpeace.

9 As I grew older and I became a little more aware of
10 the things I was liking in school, I changed my ideas. I
11 wanted -- but I always wanted to do the sciences. I wanted to
12 be a scientist. I wanted to do research.

13 As I grew older, I honed in on something a little
14 more specific, and that was my -- I wanted an academic life.
15 I wanted an academic future. I wanted to study at Harvard.
16 That was my dream, that was my plan. I had seen it in the
17 movies and I liked the idea of...

18 Then I learned that there's, like, many of ivy
19 league schools, and I had the goal to study and apply to one
20 of those and get in. So, I wanted to do research on -- I
21 wanted to do preventive medicine research to help people.

22 Q Can you explain how the school system works in Mexico?

23 A Yes. So, in Mexico, we have three years of kindergarten;
24 first, second, third.

25 Then elementary school, and those are six grades.

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1 They start again from first grade, so first, second, third,
2 fourth, fifth, sixth grade.

3 Then comes middle school, and those are three more
4 grades, again starting from one; first, second, third grade.

5 Then there's high school, three more grades,
6 starting from first.

7 And then there's undergrad, grad, and that's the
8 same as in the U.S.

9 Q So, how old is someone, typically, when they are starting
10 high school in Mexico?

11 A High school is 15, 16.

12 Q Starting with elementary school, how were you as a
13 student in school?

14 A I was a stellar student, if I may say for myself.

15 Q Can you explain?

16 A Yes. And I really liked school, so I was very dedicated.
17 I had perfect grades, needless to say.

18 But I was also pretty dorky, pretty nerdy. I was
19 the type of student that -- I was fascinated by what we were
20 learning. So, I would go back home -- and for a long time
21 there were no computers, so I would go to the encyclopedia and
22 do research and copy it on to my notebook and bring it to the
23 teacher. And I was truly enthusiastic about it, which maybe
24 was why I had trouble fitting in other areas. But I was very
25 dedicated and I did really well.

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1 Q Other than school, did you participate in any other
2 activities?

3 A Yes. So, my parents did a very good job of filling up
4 our time, but, also, my father had a very good idea of what he
5 thought was a good balance.

6 He, himself, was one of seven children and the only
7 one to have attended college. And he did so on a scholarship.
8 He was very proud of his education. And when he went to
9 college, he played tennis. So, when we were growing up, he
10 considered it very important that we applied ourselves to a
11 sport and that we did so in a competitive way so that it would
12 create a balance in our lives. So, one of the things we did,
13 we did -- tennis was a family sport. We trained about three
14 hours a day.

15 Also, from a very young age we attended English
16 classes. He was very aware it was a very important tool for
17 our future, so we did so every day. And I also did things
18 like -- I did contemporary ballet and a little bit of piano.

19 Q At some point, did you have to take a test to get into
20 high school?

21 A Yes. Yes, it was an aptitude test of verbal and math
22 skills.

23 Q Can you explain the importance of that test in Mexico?

24 A For the school. I don't know if it was a test in all of
25 Mexico, but it was certainly for the high school that I

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1 applied to, which is a high school that's related to the
2 college program, which is the most elite college program in
3 Mexico. And I applied to the high school that's part of that
4 program.

5 So, this test, this aptitude test, there was a
6 single aptitude test for all the different levels; not only
7 high school, but also grad and undergrad. And there were
8 different levels of scores required to get into each of the
9 different programs.

10 Q So, just to take a step back for a second, for high
11 school, where you grew up, was there a local high school?

12 A There was, but the academic level at least was not
13 something that fit in with my plans.

14 Q So, at the time when you were ready to go to high school,
15 were there a few options available to you?

16 A There were really two options available. There was the
17 capital of the state or Monterrey, which was where I ended up
18 going to high school.

19 Q And the one in Monterrey was also affiliated with a
20 university; is that right?

21 A Yes. It's actually called Techno Monterrey.

22 Q So, you take this test, and how do you do?

23 A I did really well.

24 Q Is there something -- is there a way of noting how well
25 it was?

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1 A Well, I got the high score of my class.

2 Q And was this -- you said this is the same test that would
3 be used to get into the university programs as well?

4 A Yes. So, yes, I think I can explain a little bit.

5 The same test is used for engineering, medical
6 school, the high school diploma. And, so, the program in high
7 school that I applied to was one of three. The high school
8 had three programs with three different levels of difficulty.
9 I applied to the most difficult one, and the scoring required
10 for that program was actually higher than the scoring required
11 for medical school.

12 Q So, what was the name of the program that you did get
13 into?

14 A International baccalaureate.

15 Q Is that something that's an international program?

16 A Yes, it is.

17 I believe it was started for children of diplomats
18 or people who traveled a lot so they were able to transfer
19 their education from country to country.

20 Q How large was the high school that you were a part of?

21 A About -- the class was about six, seven hundred people.

22 Q And how many people were in your international
23 baccalaureate program?

24 A Fourteen.

25 Q How far away from your hometown was the school in

1 Monterrey?

2 A About four and a half hours by bus.

3 Q How did you feel about going away?

4 A Well, it was difficult. At the time, it felt like
5 heartbreak to me. I was very aware, even, like, the months
6 before I left, that I was leaving a chapter of my life behind
7 and I was going to be away from my family and perhaps forever,
8 perhaps that was the last time that we were going to be
9 spending time as a family.

10 It was very sad. It was very sad that I had to part
11 with, you know, the nucleus, this bubble where I felt safe.
12 So, it was for me in particular -- I think for anybody at 15,
13 but it was a pretty big break.

14 Q Where was your older sister, Marianna, when you began
15 high school?

16 A When I began high school, my sister had been already
17 studying the first two years of high school for her in the
18 capital of the state. Same school, different program. And
19 the capital is about two hours away from my hometown, so a
20 little bit closer.

21 Q When you started at high school, did she transfer to your
22 school?

23 A Yes.

24 Q What was it like being in your first year of high school
25 with your older sister, Marianna, being there?

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1 A It was difficult. It was difficult just because so much
2 of it was very new. Simple things, like preparing my own
3 food, I didn't know it. Growing up, there was my mother,
4 obviously, and we also had help in the house.

5 So, having to decide what to eat for breakfast,
6 lunch, dinner, washing my clothes, the routine of an
7 independent life, that was new to me, that was certainly
8 difficult. But doing it with my sister was even more
9 difficult.

10 My sister was a little more normal than I was, so
11 she had an active social life. She liked partying. And when
12 we were in Monterrey together, she started hanging out with, I
13 think, bad company. She developed a pretty severe eating
14 disorder. It was, like, in at the time with the elite there,
15 or at least this group of people that she was -- like, the
16 popular girls that she was hanging out with.

17 And, also, she was partying a lot and drinking a
18 lot, so much so that I started going out to nightclubs, which
19 is not something I used to do, just to make sure she was okay.
20 So, I was taking care of her.

21 Q So, you were the younger sister but you were taking care
22 of your older sister?

23 A In that respect yes.

24 Q Would that happen later as well?

25 A Yes.

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1 Q You said she developed an eating disorder.

2 Was there a specific eating disorder she had?

3 A Yes. She was throwing up. She had bulimia.

4 Q Did Marianna graduate from high school that year?

5 A Yes, she did.

6 Q During your first year, did you apply to other high
7 schools?

8 A Yes.

9 Q Why was that?

10 A So, even before it -- before, when I was back in my
11 hometown and I was deciding where to go to school, as I said,
12 it was my dream and my plan to study. In fact, very
13 specifically my dream was to study in Switzerland. I have
14 family from Switzerland and I had been admiring the calendars
15 with beautiful pictures and learning about it for a while.

16 So, even before, I had applied to schools in
17 Switzerland and I had gotten in, but my mom put her foot down
18 and said, For the first time that you leave, it's the first
19 time you're going to leave home, you at least have to stay in
20 the country.

21 So, I wasn't allowed. But for the second year, it
22 was the second year, so I was allowed. What I did is, taking
23 advantage of the IB program that I was a part of, I searched
24 out all the schools that had that program and contacted the
25 admissions office for all these different places, applying for

1 a transfer to do a year abroad.

2 Q How did you figure out which schools to apply to?

3 A I printed a directory of all the IB schools and I
4 filtered the ones I wanted to. Some of them didn't have, you
5 know, easily available -- like, the internet was not as well
6 grown as it is today, maybe. There's no app to, like, apply
7 to every school.

8 So, some of the schools that I was looking up didn't
9 have a straightforward way to apply to them, so I would just
10 write letters introducing myself and explaining who I was,
11 that I was interested in studying there.

12 And that's how I searched them out and contacted
13 them all.

14 Q And did you -- did you actually receive responses from
15 schools?

16 A Yes, some. But one in particular that was surprising and
17 remarkable because it was my main pick, they had contacted me
18 back.

19 Q What school was that?

20 A It was called LAS, Leysin American School, in
21 Switzerland.

22 Q Why did that school in particular appeal to you?

23 A Well, it was located in a resort in the Swiss Alps, which
24 was beautiful. It also was very elite. This was a school
25 that catered mostly for people of very high level and,

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1 apparently, had, like, an extraordinary academic level.

2 Q Is it fair to say this school fit in with the plan you
3 had?

4 A Yes, yes.

5 Q So, what happened after you applied to that school?

6 A So, what happened is I received a phone call which was
7 very surprising from a man called Paul Dyer, who was the head
8 of the admissions office at LAS. And he told me that he was,
9 essentially, pleasantly surprised by my letter.

10 That was one of the schools that didn't have an
11 application. I had just sent an introduction package from
12 Daniela. And he said he would like to meet me, he would like
13 to meet my father. He wanted to interview us, he wanted to
14 interview me, you know, to -- like, I wasn't admitted. He
15 wanted to meet me and he had an appointment in Mexico, so I
16 set up an appointment with my father, and we met in Monterrey
17 with Paul.

18 Q How did the interview go?

19 A Well, I was very nervous, and I remember it was an
20 academically-oriented interview. He had financial questions
21 for my father.

22 But the interview went very well because after that,
23 I received another phone call from Paul to announce that not
24 only was I admitted but I was being granted the only
25 scholarship that they gave out a year. So, it was fantastic.

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1 Q Did you decide that you were going to attend that school?

2 A Yes, yes. I mean, there wasn't much to decide.

3 The main issue was that even with the scholarship,
4 it was a very expensive trip, it was a very expensive thing to
5 do. So, the main thing was on my dad, but he approved. He
6 looked at the numbers and did what he had to do.

7 For me, it was an automatic yes.

8 Q So, you were set to go to this school.

9 A Yes.

10 Q So, what academic year would you have been starting at
11 LAS?

12 A My second year of high school.

13 Q And what year would that have been?

14 A 2002.

15 Q Approximately September 2002 you would have been expected
16 to start there?

17 A Yes.

18 Q Did you take any other steps in order to plan to start in
19 September 2002?

20 A Yes. I applied for the immigration, the visa required,
21 to be able to go to Switzerland; my father got his finances in
22 order for that; I started -- I gave notice to my high school
23 of transfer.

24 So, everything was in place.

25 Q At some point, did you learn about a program called

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1 Executive Success Program?

2 A Yes.

3 Q And is that sometimes abbreviated "ESP"?

4 A Yes.

5 Q When did you first hear about ESP?

6 A I heard about ESP for the first time approximately the
7 second semester of high school.

8 Q And how did you learn about that?

9 A My parents were taking a course. They called it an
10 "intensive."

11 Q Did you have a general sense of what type of program it
12 was?

13 A My parents had been taking some, like, a string of
14 self-help programs for a while, so I understood it was another
15 self-help program.

16 Q At that point in time, had you taken any self-help
17 programs?

18 A Yes. My parents had trapped me into a few of those.

19 I had taken something called Empowerment, which was
20 a program that connected you to your inner child, which I was
21 a child so it was easy to connect.

22 I also took NLP -- and I was young. NLP is
23 neurolinguistic programming. I was young. It was for kids,
24 so I found it very boring.

25 Q Do you have a brief understanding of what NLP is?

Proceedings

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1 A I don't. I can tell you what I learned in that course
2 was such basic things as when you say no to a human being, it
3 really means yes. Or maybe it was the opposite or something
4 like that. Or when you talk to yourself in the negative, it
5 has the opposite effect. It was something very simple and
6 very, like -- I don't have a very good understanding.

7 Q Were you impressed with any of those courses?

8 A No, no, I mostly -- and I think all my siblings, because
9 we all took them -- we mostly just went along with my parents.

10 Q Where did your parents take their ESP intensive?

11 A In the city where I was going to high school, in
12 Monterrey.

13 Q Were you spending time with them while they were taking
14 the intensive?

15 A Not with them. In their hotel room.

16 Q Why was that?

17 A While they were taking the 16-day intensive, it was still
18 a school year. And I was living with my sister Marianna in
19 on-campus residency which did not have AC, and Monterrey can
20 get really, really hot. So, what I was doing is I was coming
21 out of school and going -- instead of going back to campus, I
22 would go to my parents' hotel and I would watch TV and snack
23 all afternoon.

24

25 (Continued on the next page.)

Daniella - direct - Penza

2300

1 (Continuing)

2 Q What was your parent's relationship like at the time when
3 they were taking these classes?

4 A They had been having -- they had been having issues in
5 their marriage, from the time that I was about 15 years old
6 and I have very good relationship -- a very good relationship
7 with both my parents, so they both confided in me separately.
8 I didn't know the intimate parts, but I knew that they were
9 struggling with each other.

10 Q So your parents are taking the ESP intensive while you're
11 in your first year, while you're in your second semester of
12 your first year of high school.

13 A That's right.

14 Q At that point, had you made the plans about going to LAS?

15 A Yes.

16 Q What did your parents tell you about the ESP course while
17 they were taking it?

18 A While they were taking it, I knew very basic things that
19 it wasn't just a self-help program. It was a scientific one,
20 that it was based in science and that the creator was a
21 scientist and the smartest man in the world.

22 Q What did you think when they told you that?

23 A I mean, given my, my angle in life, just the intellectual
24 part was impressive to me. But it didn't make much more of
25 it, it was like wow, okay.

Daniella - direct - Penza

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1 Q At some point, did you end up taking ESP, an ESP
2 intensive yourself?

3 A I did.

4 Q How did that happen?

5 A As a -- as a farewell gift from my parents, from my
6 father, he gifted me a 16-day intensive. He said it was so
7 good that he wanted me to take it, so that I could make the
8 most out of my upcoming trip to Switzerland.

9 Q So did you end up taking the 16-day intensive?

10 A Yes.

11 Q When was that?

12 A In -- in the summer prior to me leaving.

13 Q So how old were you?

14 A I was 16.

15 Q And where did you take it?

16 A In Monterrey.

17 Q What do you remember from your first ESP intensive?

18 A I remember the head trainer was a person who teaches the
19 intensive, her name was Lauren.

20 Q What's Lauren's last name?

21 A Salzman.

22 Q What were your impressions of Lauren Salzman?

23 A She was sharp. She was bubbly. She was smart and she
24 was likable.

25 Q Sorry. What else do you remember?

Daniella - direct - Penza

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1 A I remember being intimidated.

2 Q Why were you intimidated?

3 A This was a very, I thought at the time, very
4 sophisticated group of people. It was the Mexican people
5 there were all part of the Mexican elite, very wealthy people,
6 very successful people. And I was a 16-year-old student from
7 a small town in Mexico, I felt it was -- it was -- it was
8 an -- it was intimidating but in like, in a -- I guess in a
9 good way. Like, not in a negative way.

10 It was just very impressive, you know, the level of
11 people there.

12 Q Did the level of people there have an impact on you and
13 your perception of the course?

14 A I mean, to me, it lended validity, like implicit
15 validity. You know, like, society at large validated the
16 successful people and all these successful people validated
17 that this thing they were doing here was something, by all
18 counts, very good, very interesting, very valid.

19 Q Did you learn the defendant's name while you were taking
20 the intensive, Keith Raniere?

21 A Yes.

22 Q And how was the defendant spoken about during the 16-day
23 intensive?

24 A He was spoken about a lot and it was with -- with that
25 degree of reverence. He was -- they showed us his picture. I

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1 mean, by the end of the intensive I thought I knew what he was
2 like.

3 They, of course, said he was the smartest man in the
4 world.

5 Q Is that something you would hear a lot in the coming
6 years?

7 A Yes. And I mean, to me, that was kind of enough. I
8 mean, as a person who valued intellect the most and all of
9 that, as a scientist and the smartest man in the world.

10 Other things were also said. All of them like,
11 impressive sorts of things; that he was unified. That he was
12 a renunciate.

13 So there was like this aura of saintlihood of sorts.

14 Q What did unified mean?

15 A Unified in ESP terms, I believe, means you have no
16 disintegrations. So it is, in essence, like the endpoint,
17 like the whole reason everybody is trying to go through all of
18 these courses and removal of disintegrations and so they can
19 get like reach this nirvana; this point where there's nothing
20 else to be fixed.

21 And essentially, as I understood it, you no longer
22 react to the external world. You don't have any
23 contradictions in the way that you feel, you act, you think
24 and you act.

25 Q Was anyone ever described to you as being unified?

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1 A Just one person.

2 Q Who was that?

3 A Keith Ranieri.

4 Q You said that he was described as a renunciate. Can you
5 explain that?

6 A Yes. They spoke about how, like, simple he was. How
7 little he was focused on material things. How you say like,
8 he could eat pizza every day, he doesn't care about, you know,
9 variety in his diet, you know, like.

10 He was like, simple, like, a little bit like, like a
11 monk, a little bit like, like better. Like, past all these
12 mundane things. That's what I understood.

13 Q Did you have -- at that time, did you have any thoughts
14 about the defendant's sex life?

15 A No.

16 Q Did you find it surprising given -- given how smart you
17 were, that you had never heard of the defendant before?

18 A No, I really didn't think it through that way.

19 Q Did anything from the curriculum particularly strike you?

20 A Yes.

21 Q What was that?

22 A It was a -- it was a particular class. They call them
23 modules, that was called the mission. I found that had a huge
24 impact on me.

25 Q So can you explain what happened?

Daniella - direct - Penza

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1 A Yes. So in this class -- in this class -- and they used
2 like a white board with paper and like a marker and like drew
3 the world. Like a big circle.

4 And in that my first -- in my first intensive in
5 this class they proceeded to like, proceeded to -- Lauren --

6 Q I'm sorry. Did you say it was Lauren?

7 A Yes, the head trainer.

8 They proceeded to, one by one, describe how every
9 effort that humans, humanity are making to better the world,
10 are futile. So it was essentially all of my dreams, like, oh,
11 we are trying to save the whales with Greenpeace, you know,
12 we're trying to cure cancer. We're trying to end world
13 hunger. We're trying to achieve peace in the world.

14 And what I thought was a very clean, logical
15 progression, demonstrated that all of these efforts are
16 futile. We can't help the world that way. We can't help the
17 world that way because we're just going to keep recreating all
18 of these problems as long as we are disintegrated.

19 So the only way -- and this was like to me, it was
20 an elegant progression that made sense to me. So the only way
21 to really help the world was through the ESP tech, and that
22 was an issue, because if humans became integrated -- and not
23 all of them because in that same class it was presented that
24 Keith Raniere, the vanguard, scientist and smartest man in the
25 world, had come up with this mathematical calculation for the

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1 state of the world, and this calculation was at the pace that
2 we were going, if we didn't change the course, and like really
3 push that mission and more people got integrated and more
4 wealth was controlled, the world was going to end -- and I
5 don't remember, it was like a period of like 10 or 15 years.

6 So given what I was trying to do, you know, I was --
7 I was -- I was -- I was and it was -- it was a bit of a
8 childish idea, perhaps, but I wanted to become a scientist and
9 do all these things to help save the world.

10 And here, this class demonstrated to me that
11 anything I was going to attempt to do wasn't going to be at
12 least as impactful as what they were doing that really had the
13 potential to change the world and we were against the clock.

14 Q What do you think now, looking back on that class?

15 A Well, first of all, I think several things about that
16 class.

17 First of all, I had pictured -- I had pictured the
18 calculation, the mathematical calculation that's an actual
19 computation out of the output of the state of the world in
20 several ways. I -- I knew -- here now, I know that they use
21 that calculation many times before. It was never refreshed,
22 it was always the same. So, it was -- it wasn't real.
23 That -- that wasn't real. That -- that was a lie. That there
24 was no mathematical calculation for that. It was just
25 someone's idea. Keith's idea.

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1 And the module, the mission -- I mean, it changed
2 the course of how -- the next decisions I made on my life,
3 which affected everything else. I don't think that is true.

4 Q Who else do you remember meeting at the intensive?

5 A I remember meeting at the intensive Loreta, Loreta Garza.
6 I met Danny Padilla there. Luis Montez. The Boone brothers;
7 Omar and Edward Boone. I met -- as far as people that are
8 still in there, I think that's about it.

9 Q Overall, what were -- what were those people doing at the
10 intensive?

11 A They were coaching. So there was a head trainer and then
12 there were other people who -- so there's a ranking system.
13 And so they were not students. They already had some kind of
14 a rank. And they were basically facilitating the class.

15 So there was like a main teacher, but then there
16 were coaches who were guiding the discussion groups. That's
17 what they were doing.

18 Q During the intensive, did you come up with a mental image
19 of who you thought the defendant was?

20 A Yeah. I mean, through the descriptions and they talk
21 about him, I thought, yeah, I thought I had a pretty good idea
22 of what to expect.

23 Q What did you think you were going to expect? What were
24 you expecting?

25 A I was expecting -- well, a really smart person, and

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1 dedicated to this -- to this -- to this mission, and kind of
2 elevated. You know, like, I -- I -- I expected -- yeah, I
3 think that was it.

4 I -- I also had like an idea of what it would look
5 like, because there were also so many descriptions about that.

6 Q So what did you think it would look like?

7 Sorry. I'll step back.

8 What do you mean there are so many descriptions of
9 what?

10 A Of like how he would dress and how he was like, you know,
11 because of the renunciate thing. So I expected like a
12 simple -- like a simple guy with a -- with a sophisticated
13 mind and like a little nerdy. Like I knew most smart people
14 that I knew were like.

15 Q Did you have an understanding back when you were taking
16 this intensive of the where NXIVM was headquartered?

17 A Yes. In New York.

18 Q Did you have an understanding of where in New York?

19 A No.

20 Q So did you think New York City at that time?

21 A I knew it was not New York City, but I didn't know what
22 then. I just knew -- like I knew it was not New York City. I
23 had asked. But I imagined -- I imagined something not like
24 what it was. But I imagined somewhere in between, I guess?

25 Q So you said that this module had a big impact.

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1 What happened next?

2 A Well, that was the impact and then that's somewhere in
3 the middle. Actually, I think that's somewhere in the five
4 days. So I continued taking the intensive and as the classes
5 progressed, there was like a certain degree of attention on
6 me, which there usually wasn't. So that was very flattering.

7 And so by the end of the intensive, somewhere close,
8 I was -- I was having conversations with Lauren and she -- not
9 formally, because there wasn't like, oh, we have a vacancy.
10 But it was like, why don't you come with us? Like you could
11 help the mission. So come work with us.

12 Q Did you tell Lauren that you had plans to go to LAS?

13 A Yes.

14 Q How did she respond?

15 A I don't remember, but I do remember that I was surprised
16 by like the nature of the conversations and the offer.
17 Because I didn't have any valuable skill sets. I was a
18 student of high school.

19 So I was incredibly flattered but also very
20 surprised. Like, oh, thank you, but what do you think I can
21 do to help? I mean, I don't know anything.

22 Q And did anyone explain to you what they thought you could
23 do to help?

24 A More than explain, they looked for things or skills that
25 I may have that might fit in with something that they were

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1 doing. And sure enough, they ended up honing in on the
2 programming. And I had just started programming my first year
3 of high school. In my hometown there was nothing close. I
4 didn't even know that one can study programming.

5 And so in the -- in the questions that they were
6 asking me, you know, like, well, what do you like? What have
7 you done? What are you good at?

8 I was like, well, I just learned how to program.
9 That's it. So the problem was I learned to program in a
10 pretty archaic languaging program, which is like usually how
11 you start programming. It's called Pascal and definitely that
12 wasn't the language that they used in the programming that
13 they did in Albany with ESP.

14 But they said, you know, you're so smart. We're
15 going to teach you and then you can work with us.

16 Q How -- so you were 16 at the time; is that right?

17 A Yes.

18 Q How old were the other participants in the course?

19 A Oh, they were all full-grown adults.

20 Q Did that get discussed at all with anyone, that you were
21 much younger than the other people who were participating?

22 A Yes. I mean, certainly it wasn't a secret. And also it
23 was -- it was emphasized quite a bit. I felt flattered by it
24 really. Much of what was said was, wow, how lucky you are to
25 be receiving this, to be getting this, when you're so young.

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1 I'd do anything to learn this back when I was your age.

2 Q So at this point, what are you thinking? What do you
3 want to do?

4 A Well, that was a really important intersection in my
5 life. On the one hand, I was on course with my plan, on
6 course with my dream, and this had just really been something
7 I took to make the most out of that.

8 But that module, the mission, had made a huge
9 impression on me and the mathematical calculation, the
10 tick-tock of the world is going to end and something needs to
11 be done, was also something that, in my childish understanding
12 of things was -- was massive and impressive and important.

13 So I didn't say -- I didn't jump on it right away.
14 The offer that was discussed through the intensive,
15 discussions continued. They put me in touch with a woman
16 called Karen Unterreiner, who was the head of, like, she was
17 doing the programming. So like the communication continued,
18 but I didn't decide because I already had my decision to go to
19 Switzerland.

20 Q Okay. When you say they put you in touch with Karen
21 Unterreiner, who do you mean?

22 A I mean like, Lauren. I mean Lauren.

23 Q While you were contemplating this decision, did you
24 discuss it with your parents?

25 A At length, yes.

Daniella - direct - Penza

2312

1 Q And what was your -- what were your parents telling you?

2 A My parents were not telling me to go one way or the
3 other. I think they respected my decisions a lot and,
4 honestly, they were also very much into like ESP and enamored
5 with the curriculum. So they never told me do this or do
6 that. They also didn't tell me you can't do this, you can't
7 do that. So we were just discussing it, you know.

8 Q What would they say about the defendant?

9 A Well, they were, as I was, very impressed with him. He
10 was a great man. That he was doing great things.

11 Q At that point you had not met him; correct?

12 A No, I had not.

13 Q So where have you gotten this entire impression of the
14 defendant?

15 A From the people who talk about him. So from my parents,
16 from people taking the intensive, from Lauren, the head
17 trainer.

18 Q So what did you decide to do?

19 A So in the end -- and I remember even where I took the
20 decision, it was a family gathering on the weekend at my
21 aunt's house and by her well. I decided, okay, all right. So
22 I'm going to take a sabbatical. I'll take a year off school.
23 A year from now, school is still going to be there. Maybe not
24 LAS, I will lose the scholarship, but I will find something
25 else; right? And I'll go and for a year I will go and I will

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1 help. I thought it was that important. I thought, okay, I'm
2 going to do my part.

3 So I called Paul Dyer and I told him that I was
4 going to refuse the scholarship, and that I wasn't going to
5 attend. And he didn't take no for an answer right away. He
6 said are you sure? You know, what are you going to do? Have
7 you thought about it? Do you understand what an opportunity
8 this is?

9 And so he paused on me and he said, think about --
10 call me back with your confirmation.

11 And so I thought about it a little bit longer, but I
12 decided to refuse the scholarship in the end, and I called him
13 back and I -- I declined.

14 Q What was it like making that phone call?

15 A It was difficult, but I thought I was making the right
16 choice.

17 Q At that point did you truly believe that the defendant's
18 calculations about the end of the world were correct?

19 A Yes. Wholeheartedly.

20 Q I'm sorry?

21 A Wholeheartedly.

22 Q So what happened after that?

23 A After that, we were all happy about my decision,
24 including my parents. And so we started planning. And the
25 plan ended up being that the time to go coincided with

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2314

1 something called -- well it coincided with Keith Raniere's
2 birthday. So it was his birthday celebration. V week.

3 So the plan was for my parents to go drop me off at,
4 you know, at Albany to stay, staying by -- staying through V
5 week, setting me up and then leaving.

6 Q So is this August 2002?

7 A Yes.

8 Q How old were you then?

9 A 16.

10 Q So you would have been turning 17 in October 2002; is
11 that right?

12 A Yes.

13 Q You mentioned before that there were different ranks in
14 ESP. What rank were you?

15 A I was white. That's a student.

16 Q What rank were your parents?

17 A They were whites. They were students.

18 Q Did your parents elevate after that?

19 A They -- they did.

20 Every time you enrolled a number of people, you got
21 a -- like a stripe or you got promoted. So my father or my
22 mother enrolled me, probably got a stripe or two.

23 Q What do you remember from the first V week you attended?

24 A I remember it was in a place called Pyramid Lake. It was
25 like a forest setting, very rustic, and there were like little

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1 cabins spread throughout. There were a lot of people there,
2 like really cool people, but all I can remember -- and the
3 ambiance of the entire gathering is we had activity throughout
4 the day, but I was looking forward to the forums with Keith
5 and it felt like that was everybody's focus as well.

6 There was like this latent looking forward to,
7 there's going to be a forum tonight or what's Keith doing and
8 you know. So it was -- it was Vanguardcentric.

9 Q At that point had your family, your parents, met the
10 defendant yet?

11 A No.

12 Q So you were all looking forward to this?

13 A Yes.

14 Q Do you remember actually meeting the defendant for the
15 first time?

16 A I do.

17 Q Can you describe that? Can you describe your initial
18 impressions?

19 A Yes. I thought he was exactly what I expected and he
20 was -- he looked smart and acted smart. I -- I had a bit of
21 contact with other like really smart people before, and they
22 all have like a little quirk, or like a little weird, or off
23 in some way. And he certainly wasn't normal. Like it wasn't
24 just like, oh, a plain guy.

25 He had that vibe of like, a geeky man. He was also

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1 very attentive and very soft-spoken, and had like a suite
2 presence about him.

3 Q When you say he was attentive, what do you mean?

4 A Well, when I met him -- and when I met him I was with my
5 parents -- he called me by my first name. So I had not met
6 him yet and he called me by my name.

7 And he said I hear you're very smart. So I call
8 that attentive.

9 Q How did that make you feel?

10 A Incredibly flattered. I mean, it was -- and I'm not one
11 to crush on celebrities, but I mean, given my temperament and
12 what was important to me in life, he was the smartest man in
13 the world. So he was like a rock star. Like that moment was,
14 like, oh, my God. And then he said my name and he called me
15 smart.

16 So that moment was so special. Was so special. And
17 my parent were with me, so it was a truly special moment.

18 Q How do you feel about that moment, looking back?

19 A It was all a lie.

20 Q Did you meet any other people at V week?

21 A Yes.

22 Q Who else did you meet?

23 A So there was Esther and her kids, who were like beautiful
24 blonde little kids running around. Those were the only young
25 people I remember.

Daniella - direct - Penza

2317

1 Q Do you remember -- do you remember their names?

2 A Yes, I think. There's Dominick, Rosie, Robby and Theo.

3 Q And about how old were they?

4 A They were like, babies. I mean, they were like kids. I
5 don't know that they had taken any classes. I assume not. I
6 mean, they were like just too young.

7 Q Were you -- other than them -- or how old were the other
8 participants compared to you?

9 A They were same as in an intensive. They were all fully
10 grown. They were all adults. I was the youngest. I thought
11 that was actually, you know, like, had taken an intensive.

12 Q And Esther, what was her role in ESP? Do you know?

13 A I think at the time she was a proctor. So she was like a
14 high-rank person.

15 Q And was that instilled -- at that point, did you know
16 that there were certain rules as to people who were higher
17 rank than you?

18 A Oh, yes. I mean, that's all taught in the intensive.
19 It's like -- it's all intertwined as part of like, the tribute
20 and part of like, the value.

21 So she had someone -- she was -- she had a higher
22 rank. Automatically there was like a degree of -- of a -- of
23 respect attached to that.

24 Q So that degree of respect would continue on to social
25 events and things like that?

Daniella - direct - Penza

2318

1 A Yes.

2 Q Who else did you meet at V week?

3 A At V week and shortly before, because it was just so
4 fast, I met Karen Unterreiner, who I had been exchanging, I
5 believe, phone calls. It was communication, since I was in
6 Mexico, I met -- I met Michelle Salzman, Lauren's sister. I
7 met Barbara Jeske. I met Pam Cafritz, very briefly. She was
8 like accompanying Keith.

9 I met Nancy Salzman. I met -- well, there were a
10 lot of people from Mexico.

11 Q Any people who impressed you the same way you had
12 described earlier?

13 A All of them. I mean, everybody involved was impressive
14 in one way or another. And I was generally intimidated by
15 people, so.

16 Q The way you described it before, about being from
17 particularly wealthier families, was that evident to you once
18 you were at V week?

19 A Yes.

20 Q What was your impression of Nancy Salzman when you met
21 her?

22 A She was -- she was a little bit frightening. She was
23 like very energetic and like, very like, loud and it felt
24 almost like pushy, like in a very firm way. So she scared me
25 a little bit.

Daniella - direct - Penza

2319

1 Q What about Karen Unterreiner? What were your impressions
2 of her?

3 A Karen. Karen, I felt very -- I thought she was very
4 sweet. She was like a little -- like a little -- a little
5 mousey, but very sweet. I -- I was very shy to speak English.
6 I had been taking English lessons all my life, but I had never
7 like been talking in -- in a setting where it was only
8 English. So I felt comfortable with her.

9 Q Did you have an impression of what her role -- did you
10 have an understanding of what her role was in ESP?

11 A Yeah, right away she -- she introduced herself and her
12 role to me, because I was -- she was to be my boss,
13 essentially.

14 So at the time she was in charge of the
15 administration office and all the administration stuff. And
16 also in kind of hand in hand with it, the IT department. So
17 the creation and the maintenance of a computer system that
18 kept track of all of the company.

19 Q Was that a complex system?

20 A I think so.

21 Q Were you impressed with her?

22 A Very. She had like a like -- a very high degree in
23 mathematics. I remember she told me she was like an actuary
24 and I remember looking it up and looking at the calculations
25 and thinking, oh, my God, this is so high-level. I thought

Daniella - direct - Penza

2320

1 she was incredibly smart.

2 Q You said that Pam Cafritz was accompanying the defendant.

3 Can you explain that?

4 A Yeah. It seemed like -- I remember that first visit. It
5 was like the period of time when I first went up to Albany. I
6 didn't have much interaction with Pam, but I always saw her
7 like tagging along to Keith. Like I -- I almost felt like she
8 was his handler of sorts. Like -- like -- she was in charge
9 of like -- maybe like a personal assistant or something.

10 That's what it felt like.

11 Q At Vanguard week, was there any discussion of enrollment
12 of other people?

13 A Yeah, but that wasn't exclusive to Vanguard Week.

14 Q Okay. Can you explain that?

15 A I mean, it was part of the basis of everything. In fact,
16 just to be able to go up in ranks, you had to enroll. So you
17 could not go up in ranks on merit itself, being well or like,
18 just, you know, in this case I guess it would amount to, oh,
19 you're more integrated, or I don't know what other actual
20 measures.

21 But if you had not enrolled like a certain number of
22 people, you just weren't going anywhere. So it was built in.
23 And anyone who wanted to grow in ESP had to enroll. It was
24 encouraged. I would say, almost dictated. It was part of if
25 you really believe in something, wouldn't you want to share it

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1 with everybody else?

2 And in the case of the mission, you know, the point
3 was that we didn't need everybody to be integrated. We didn't
4 need everybody, you know, to be like, unified to save the
5 world. But we needed enough people in control of enough
6 resources to change the course of the destruction.

7 So it was -- it was super important and implicit in
8 everything.

9 Q So after -- was it actually a week at that time, V week?

10 A No, I don't think so. I thought -- I don't remember
11 exactly. Maybe it was four days. It was like a small -- it
12 was a small period. It wasn't -- I didn't pack that much. So
13 it was -- it was a number of days.

14 Q Is it fair to say that the V weeks increased in length
15 over the years?

16 A I did attend later V week celebrations and, yes, they
17 became longer and longer.

18 Q And did the locations sometimes change?

19 A I believe it just changed the once and then stayed there.
20 Pyramid Lake was the first one that I attended and may have
21 been the last one that happened there.

22 All the subsequent ones that I can remember where in
23 the place called Silver Bay. That was like a -- like a
24 retreat by the lake.

25 Q Now, after that event ended, you stayed in -- you stayed

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1 in the Albany area; is that right?

2 A Yes, that was a plan.

3 Q And your parents went home?

4 A Yes.

5 Q So where were you living at that time?

6 A So the arrangement that was made was, I was to stay
7 with -- there was a man called Edgar Boone, and he owned an
8 apartment. Nothing really as close in Albany, so it wasn't
9 walking distance, but it was sort of close to the center, to
10 the ESP center, which was in 455 New Garner Road.

11 And so I was staying in his apartment. In that same
12 apartment, Loreta Garza was staying, so we were roommates and
13 Edgar was staying there too, although not all of the time,
14 because he was going back and forth to Mexico.

15 And there was a -- a pretty decent flow of people
16 coming in and out of the place, because Edgar was a
17 salesperson and he enrolled a lot of people from Mexico so
18 when there was an intensive, many times he had people staying
19 over at the house.

20 Q What was it like living there?

21 A It was -- I mean, to me, it was strange, in a very
22 personal way, because I have had, had had a hard time like,
23 relating to other people, and that was very -- it was a very
24 small apartment. All of them were grownups, like, all of
25 these adults, and I'm there in the middle. It was a strange

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1 experience.

2 Q So you had gone there before.

3 What happened with the job?

4 A So I started working with Karen and she started like in
5 the first few days, weeks, giving me the lay of the land.

6 Explained to me what the computer system was, did, how admin
7 worked, what languages she was programming in. She was
8 programming in PHP with MIT SQL database on an Apache server.

9 I was -- she was showing me all those things. And I
10 was supposed to learn -- they were supposed to teach me. She
11 did hand me a PHP book and I was supposed to do those
12 exercises and read through that book and learn that language
13 so I could start programming.

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15 (Continued on following page.)

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1 By MS. PENZA (Continuing):

2 Q Other than handing you the book, did you have formal
3 lessons in programming?

4 A No, other than the book -- other than the book and she
5 helped me install, like, it was like a demo version but
6 something -- like a local installation so that I could try
7 like plug in the code and do the testing. The only person who
8 sat down with me maybe three times to actually teach me,
9 because those were, like, lessons, was a woman named Siobhan.

10 But she didn't teach PHP, she taught me HTML,
11 because I also didn't know HTML. HTML, I wouldn't strictly
12 call it a programming language, more like an interface design
13 code. She sat down with me, like, a couple, maybe three times
14 and taught me -- showed me and taught me things.

15 That was the full extent of any actual teaching
16 other than just, Here, learn this.

17 Q Other than what you just described and whatever basic
18 high school level or first year of high school level that you
19 had received, was everything you knew about computers
20 basically self-taught?

21 A Yes.

22 Q Now, where was the admin office?

23 A The admin office was in -- it was at 455 New Karner Road.

24 When I got there, there was just the one building.
25 Later on, other places were purchased, but there was just one

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1 building. So, going into the office, it's the last office in
2 the corner. That was the admin office. It was a small room,
3 corner, with, like, a code to enter.

4 Q What type of tasks were you given to do?

5 A I'm sorry?

6 Q What type of work were you given to do?

7 A Rapidly, the activity that I was assigned were very
8 simple data entry. I was entering applications. So, I ended
9 up putting in all the information, payment method, for each
10 one of the enrollments that they were bringing into the
11 office.

12 Q Was this the type of work you had come to Albany to do?

13 A Data entry? No.

14 Q How many hours a day were you doing data entry?

15 A A good few hours.

16 And when I was done with that, I started finding
17 ways to make myself useful, you know, because there was no
18 structure. I was used to the structure of school, and here I
19 was going into what I thought was going to be a job. I was --
20 I felt both confused and ashamed that I couldn't just learn
21 the programming language and be working for them and helping
22 the mission how I thought and envisioned it.

23 So, I just made myself useful in every way that I
24 could; I would clean refrigerators, I would clean the floors,
25 clean the bathrooms, organize the storage room. I found ways

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1 to be useful, like, a full workday.

2 Q Did you have an expectation that you would be paid for
3 your work in Albany?

4 A Yes.

5 Q Did you believe that you could legally be paid for the
6 work you were doing in Albany?

7 A I didn't understand the details at the time. I wasn't
8 offered a work visa, which I now know is required for someone
9 to be able to work and be paid legally in the U.S. So, I was
10 offered a job but no work visa.

11 Q But you did assume you would be paid.

12 A Yes.

13 Q Were you paid?

14 A Not really. And I say "not really" because I was paid a
15 few times in the beginning, and then that stopped and I wasn't
16 paid because they told me that I wasn't -- you know, I wasn't
17 there on visitor's visa so they couldn't figure out how to pay
18 me.

19 Q Was the expectation that you would get paid down the
20 road?

21 A It was definitely pushed off, and there was also the
22 expectation that I would figure out what I needed to do so
23 that they could pay me.

24 Q Did you -- in terms of getting a work visa?

25 A In terms of figuring out what to do.

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1 Q Was there anything you could figure out to do?

2 A Well, no, but now I have a completely different level of
3 clarity. They had to have requested me or had given me some
4 kind of a job offer for me to be able to get a work visa. So,
5 even if they expected me to get a work visa, it was impossible
6 without their help.

7 Q So, were you continuing to work without being paid at
8 that point?

9 A Yes.

10 Q Where were your siblings living at this point in time?

11 A In Mexico.

12 Q So, now Marianna had graduated, right?

13 A Yes.

14 Q What is she doing?

15 A She took a year off school because she also had dreams.
16 But her dream was to be a supermodel and she wanted to go to
17 Milan, which was nuts because she didn't have any viable
18 leads, it's not like she had been invited or discovered, she
19 just had this fantasy that she wanted the model lifestyle.
20 So, my parents obviously told her, No, you can't go to Milan
21 by yourself to see if you are discovered as a model.

22 And she took a year of school, had no plans, and
23 took a job as a waitress in my aunt's restaurant.

24 Q And what was her lifestyle?

25 What were you hearing about her lifestyle?

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1 A I was hearing from my parents, who I communicated with
2 regularly, that she was -- she was, like, a little depressed,
3 she was having, like, some issues. And, also, she was causing
4 some trouble; she was partying, she was drinking out with
5 friends.

6 And there was a particular event, actually, that
7 detonated my suggestion to my parents. She went out with her
8 friends one night, and they broke into a supermarket that
9 belonged to one of the kids that were hanging out with her.
10 And they broke a pinata in the supermarket and they broke some
11 things and they were drinking in there. And it was, like, a
12 big deal; like, she got grounded for it and reprimanded by my
13 parents.

14 And at that point, around that time, I told my
15 parents, Why don't you send her with me, send her here with
16 me? And maybe she can take some ethics classes at the center
17 at 4559 New Karner Road.

18 Because I think this was a center where there were
19 more people enrolled. They were offering not only intensives
20 but classes on the regular. So, I suggested, Why don't you
21 send her with me?

22 I thought I could take care of her, maybe straighten
23 her out. And she could take some classes.

24 Q Did she come to Albany?

25 A Yes.

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1 Q Where -- and did she live with you?

2 A Yeah. I mean, I didn't have a stable place to stay, but
3 she stayed with me, yeah.

4 Q Where did you and Marianna end up living?

5 A We were in several places. We for a few maybe days,
6 maybe weeks, stayed with an ESP member whose name was Rose.
7 It was just a little strange and uncomfortable for us, so that
8 didn't last very long.

9 We ended up staying for a longer period of time in a
10 hotel. So, we then did a hotel. I spoke to my father and he
11 was paying for it. We rented a hotel, the Howard Johnson that
12 was close to the center, and we were staying there together.

13 Q How was Marianna feeling when you were at the Howard
14 Johnson?

15 A She was definitely in the middle of a depression. The
16 first few days and weeks that she came, she wouldn't get out
17 of bed.

18 I remember one time -- I would get up early in the
19 morning, do my things, go to the center, and work, come back
20 later. Normal. So, I remember one day Marianna was sleeping
21 and it was a little late, didn't get up. I went to work, and
22 I remember the TV was on the horse racing channel. And I
23 left, I came back really late, and when I got back she was
24 still in bed and the horse racing channel was still on. So,
25 she hadn't been up all day.

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1 And it was like this for a good few weeks. She
2 would get up and go to the center for the classes, but she
3 would come right back. I think that she was maybe doing a
4 little bit better with the eating disorder because she had
5 gained weight, but she was also very self-conscious about
6 that.

7 So, it was very difficult time for her.

8 Q You said that she would go to the center.

9 Did she end up starting to go to the center more
10 regularly?

11 A For the ethics classes, yes.

12 Q And did something happen?

13 A Yes. So, in one of those occasions, she -- I believe
14 they had met before, but she, like, made -- had made contact
15 with Pam, Pam Cafritz. And, like, a friendship was born. I
16 saw it, like, overnight. They used to say Pam took Marianna
17 on.

18 Because to me, it was very strange. They became
19 really close, really fast. At the time, it was explained to
20 me Pam was an athlete and Pam had taken an interest in
21 Marianna as an athlete too.

22 Q Who explained to you?

23 A I think Pam or my sister.

24 It was almost as if that was the thing that they had
25 in common. But it was strange because all of a sudden she was

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1 buying things for Marianna. Marianna started playing tennis
2 again, and Pam would pay for the court time and the gear and
3 was, like, showering her with -- that, to me, wasn't a simple
4 friendship. It was strange.

5 Q Did you talk to Marianna about it?

6 A No, I didn't.

7 I felt happy that she was doing better, because she
8 was doing better. She wasn't sleeping at the hotel all day
9 anymore. She had, like, some light back in her. She was
10 starting to play tennis, which she loved. So, I thought she
11 was doing better.

12 Q At that point, did your relationship with Marianna shift
13 at all?

14 A Yeah, a little bit. Yeah, actually, a lot.

15 I would say that -- I would say as clear as I can
16 say it, that it transitioned from me taking care of her to Pam
17 taking care of her. Like, it's almost like she migrated from
18 under me.

19 Q After the initial -- I'm calling it V-Week, but whatever
20 length of time it was after that birthday celebration in 2002,
21 would you ever see the Defendant?

22 A Sporadically, yes.

23 Q Where would you see him?

24 A I would see him specifically at forums.

25 So, at the time, there were quite a bit of

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1 intensives at the center, that were held at the center. And
2 every time there was an intensive, there would be one, at
3 least, maybe two forums. And that was when Vanguard would
4 show up for a period of a couple hours, maybe more, to answer
5 questions. Just open forum, answer questions. So, that was
6 one opportunity I had to see him.

7 Also, during volleyball nights, which was on Friday
8 night, that the community got together and there was, like, a
9 volleyball match through the night, late night.

10 And there were, like -- it was not as often early
11 on, but there were more and more community events happening.
12 So, like, they would show, like, snippets of movies or would
13 have a certain theme night and there would be, like, an event,
14 a community event. Sometimes he would attend those too, so
15 that was another occasion where I could catch him.

16 Q You mentioned volleyball.

17 Can you describe what the dynamic was like at
18 volleyball?

19 A I'm sorry, I just want to specify. I would see him, I
20 wouldn't actually talk to him. I was too shy to approach him.
21 When I say to see him, I literally was to see him and listen
22 to him.

23 Volleyball nights were -- it was like a community
24 event. I don't believe it was just about playing the sport.
25 First of all, Keith always attended. So, it was -- I think

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1 the reason for everybody to go was so they could see Keith.
2 And maybe in a little more informal setting it was easier to
3 approach him and ask him maybe, like, a personal question,
4 which was difficult in a forum, was difficult to catch him in
5 any other event. So, it was an opportunity to have, like,
6 more personal contact.

7 But it consisted of -- like, late at night it would
8 start, so it would end early morning. People gathering and
9 coming in and out and a game happening. In the early days,
10 when I first got there, it was very informal. Teams would be
11 picked informally and games would be played, whoever wanted to
12 participate. And there were a bunch of people on the
13 sidelines just watching Vanguard or waiting to speak to
14 Vanguard and speaking to each other, and it was, like, a
15 community event.

16 Q Did there come a time when you actually did have a longer
17 conversation with the Defendant?

18 A Yes.

19 Q Where were you when that happened?

20 A I was at the center.

21 Q Do you remember whether there was an event going on?

22 A There was an event, and he was there. I don't remember
23 exactly what the event was.

24 Q Approximately, when was this?

25 A It was around 2003, more or less, I think.

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1 Q And what happened?

2 A I got the courage to approach him.

3 Because I was really disappointed with the work that
4 I was doing. It's not what I expected. I was very
5 disillusioned and also felt very troubled by the fact that I
6 had not been able to do any, like, meaningful work or help in
7 any meaningful way. And I felt like there was no point to me
8 being there and I wanted to go back to school and back to my
9 path.

10 And I approached him to ask him about that. Like,
11 you know, to get his opinion on that and express that.

12 Q And what did he say?

13 A He was very attentive. He asked me a series of
14 questions. So, I don't remember precisely, but I remember the
15 gist of it. Like, well, you know, very ESP-type questions:
16 What do you think your purpose is? What do you want to do,
17 like, you know, in the mission? Have you written your mission
18 statement? Like a guiding kind of thing.

19 And he said, And, so, what do you like to do? What
20 did you do before? What were your plans?

21 And, so, I shared with him what it was, and he very
22 effectively zoned in my academic interests, like that's what I
23 want. And he said, Well, you know, how high in math did you
24 get to?

25 And he wrote, like, a few equations on the board. I

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1 believe the first was, like, a quadratic equation, and there
2 was some calculus. I didn't take calculus in high school. I
3 think he was gauging my level of education. So, it was very
4 encouraging that he was precise about it.

5 And then he said, You like intellectual, academic
6 things, right?

7 And he zoned in perfectly. And he gave me a brain
8 teaser. As part of that, he gave me a brain teaser. He said,
9 Well -- and I don't remember what the brain teaser was, but it
10 was simple. And I gave him the answer right away, and I
11 thought he was very pleased.

12 And, you know, the conversation continued, and he
13 said, well, you know, something like, We should talk more.

14 And he gave me another brain teaser that was more
15 difficult. And he told me something like, When you solve it,
16 let me know.

17 It was something like that, that exchange went
18 something like that.

19 And, so, we said good-bye, and I ran into, like, the
20 other room. And I wanted to solve it, I wanted to impress
21 him, I wanted to show off. I wanted him to know how smart I
22 was.

23 So, I went into one of the rooms in the back. And
24 when I want to think, I always need, like, silence and
25 isolation. And I thought really hard and I solved it. I

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1 think it was a matter of minutes. It was fast because I
2 caught him before he left. And I approached him and I gave
3 him the answer.

4 And he was surprised, I think. He was, like,
5 pleased. So, I was very happy with myself. And he smiled and
6 he was -- he appeared to be happy, and he said, Good.

7 And he gave me -- I don't remember if that time he
8 gave me, like, his contact information or told me that Karen
9 would give it to me, but, basically, now I had made contact.
10 It was like he said we should talk, you know?

11 That was it.

12 Q Did Karen tell you anything else about the Defendant's
13 impressions of you?

14 A Yes. She said something that really stayed with me that
15 was also very flattering. She said that Keith had reprimanded
16 her because she had a genius in the admin office and she
17 hadn't even realized it.

18 Q So, how did you feel when Karen told you that?

19 A It went to my head. I felt very flattered, I felt
20 validated, I felt recognized, I felt smart. Right to the
21 heart.

22 Q After that, did you start communicating with the
23 Defendant?

24 A Yes. I started communicating with him via e-mail and,
25 also, there was more, like, one-on-one contact.

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1 So, I was no longer completely shy to approach him
2 maybe at a volleyball game or maybe when he was at center.
3 There was -- well, there was now some degree of closeness.

4 Q I just want to go back for one second. When you were
5 talking to the Defendant initially and he had zeroed in -- I
6 just want to make sure I asked this.

7 When he zeroed in on your academic focus, did he
8 specifically offer that he would tutor you?

9 A Yes, he did say he could teach me.

10 Q And was that particular thing important to you?

11 A It was massive. Yes.

12 I mean, here I was deciding -- so, I had taken a
13 year off to help save the world, but by no means were my
14 plans, my academic future and my dreams, on full stop. I was
15 realizing I was there to help, and I wasn't helping. I was
16 doing data entry. I thought at the time I was dragging my
17 feet with programming, I couldn't do that. And I wasn't
18 helping in any way. So, I wanted to continue with my
19 education.

20 So the moment he floated the idea of I could teach
21 you, it was like, wow, you mean you could teach me, like, an
22 actual education. So, it was an alternate path had opened.

23 Q Did the Defendant actually have conversations with you
24 about traditional education, formal education, versus what he
25 was offering?

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1 A Yes. In subsequent conversations, it became firm, like,
2 the offer to, I will teach you, don't go to school I will
3 teach you, was formalized.

4 So, there was no mistake, no gray area of I said,
5 Maybe I could. It was, I will teach you. Don't go to school.

6 And I did have a very specific discussion with him
7 about it because it was no light matter to me. We're talking
8 about replacing an ivy league education, like a formal
9 academic life.

10 And he did have something to say about that. It was
11 something like, Well, with ESP and the tools in ESP, the
12 degree of freedom, also being without integration and being a
13 little more advanced in that way, that we actually could
14 achieve better things than with traditional education.

15 Q Did you ever receive an education from the Defendant?

16 A No.

17 Q How far did you end up going in school?

18 A That first year of high school was the last time I
19 actually attended school. I did a little bit later on. I did
20 go into a test and I got my GED.

21 So, as far as degrees of study, the highest degree I
22 have is a GED.

23 MS. PENZA: Your Honor, would now be an okay time to
24 take our break?

25 THE COURT: I think we should go another few

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1 minutes.

2 MS. PENZA: I'm sorry, your Honor. I forgot that we
3 were breaking specifically.

4 Q You mentioned when you were talking about the
5 conversation the Defendant had with you, you said that he
6 asked questions in a "very ESP-like way."

7 Can you explain what you meant by that?

8 A Yes. So, the ESP courses provided a sort of, like, a
9 framework. So, the questions that he asked were all part of
10 that framework and were kind of leading to, well, like the
11 deficiencies that I might have, my desires mixed with what I'm
12 looking for in the world; not necessarily positively, but,
13 rather, to fill an inner deficiency. So, trying to, like,
14 navigate that is a very ESP thing to me.

15 Q You said that it was "guiding."

16 Do you have a view now on the way these types of
17 questions work?

18 A Yes, and I did even then a little bit. Not with the
19 clarity that I have now.

20 But the EM process, I always had a very hard time
21 with it, because to me, I was, like, earnestly answering what
22 they were asking me, and it seemed like they were leading a
23 certain place and they expected me to answer a certain thing.
24 And just -- I couldn't give up my mind, I couldn't surrender
25 to I'll just tell you what you want. I was, like, earnestly

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1 doing that thing.

2 So, in fact, I never -- like, I never had a good
3 experience with an EM or an integration or those famous a-ha
4 moments that, like, made you cry. To me, I could see that
5 that was kind of pushing me in a certain direction that fit in
6 with the concepts of the ESP framework but that I didn't feel
7 were true to what I was experiencing.

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9 (Continued on the following page.)

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1 BY MS. PENZA: (Continuing.)

2 Q And EM is an exploration of meaning; is that right?

3 A Yes, that's what it stands for.

4 Q Over the next decade in ESP, would you have many EMs?

5 A Yes.

6 Q And did you ever find those to be effective?

7 A No. I found them to be -- I found them to be pushy and
8 acts of discipline.

9 Q You -- have you ever heard the phrase, the tech?

10 A Yes.

11 Q Was that -- was the tech something that drew you to ESP?

12 A No. No. In all honesty, I think that if I had taken the
13 ESP intensive and just had not taken the module, the mission,
14 and had heard about that calculation and had not had that huge
15 impression of the founder being the smartest guy. Those were
16 the salient features to me. If that had not been there -- I
17 mean it wasn't bad. It wasn't extraordinary. Perhaps because
18 in my life at the time 16 years old with a life planned out, I
19 didn't have a lot to figure out. I didn't have issues. I
20 didn't have relationship problems. I didn't have a company
21 that was falling apart. I didn't have something that I was
22 trying to fix. I gained weight in that year that I was away
23 from home and that was a central -- that was my problem, but
24 the rest of the things in my life -- I was -- I was pretty
25 content. I was pretty content and I was pretty happy. And

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1 the tech and how that worked and what it did for me wasn't
2 something -- wasn't the pull. It didn't dissuade me, but it
3 wasn't the pull.

4 Q Do you feel that the tech ever did anything for you?

5 A No, I think the tech was used eventually to control you.
6 The way they used it was to control so I would say quite the
7 opposite.

8 Q During this time period when you're now communicating
9 with the defendant, are you continuing to work in the admin
10 office?

11 A Yes. I'm continuing to work because of what he said to
12 Karen and that he's interacting with me now. Like, I'm
13 allowed a degree of, like, freedom to do my own thing. So,
14 like, Karen knew that he was giving me puzzles and giving me
15 time to be there to work on my puzzles and there was no longer
16 this push to have me in this other way, as an employee/worker
17 in the admin office. I now made contact with Keith so it's
18 definitely something changed in that dynamic.

19 Q Would Karen talk to you about your interactions with the
20 defendant?

21 A Yes, we discussed them.

22 Q And would she talk to you about the problems -- were
23 these like brainteasers or more mathematical problems?

24 A They were -- yeah, I wouldn't call them brainteasers
25 anymore. I would call them -- I don't know that I would call

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1 them mathematical problems either.

2 Q What would you call them?

3 A I will explain them.

4 Q Okay.

5 A So, like, one of the problems was, like, how many
6 distinct spaces can be created by three cubes that are
7 intersected -- what's the most -- what's the most 3-D spaces
8 that can be created by three cubes intersecting each other.
9 It's a spatial type of -- yes, it has a basis in geometry and
10 math. That was just one of them. There were others that were
11 more like brainteaser, like, about with the descriptions like
12 cheese and cubes and how many spaces can you get if you do
13 this. So, yeah, like brainteasers.

14 Q Were you good at them?

15 A I liked them, yes.

16 Q Would you come back to the defendant and discuss them?

17 A The basis of our relationship was exclusively that.
18 Like, I would be contacting him -- I would work on the
19 problems and part of my motivation to work on the problems was
20 so that I would have an answer; an excuse to approach him to
21 give him those answers.

22 THE COURT: All right. I think we will take our
23 midmorning break at this time. All rise for the jury.

24 (Jury exits.)

25 THE COURT: The witness may stand down. Do not

Daniela - direct - Penza

2344

1 discuss your testimony with anyone.

2 (Witness steps down.)

3 (In open court.)

4 THE COURT: All right. We will take a ten-minute
5 break.

6 MR. AGNIFILO: Thank you, Your Honor. Thank you
7 very much.

8 (Recess taken.)

9 (In open court.)

10 (The HON. NICHOLAS G. GARAUFIS, presiding.)

11 (Defendant present.)

12 (The following occurs outside the presence of the jury.)

13 THE COURT: Bring in the witness, please.

14 (Witness resumes stand.)

15 THE COURT: Please bring in the jury.

16 (Jury enters.)

17 THE COURT: Please be seated.

18 All right. You may continue your examination of the
19 witness.

20

21

22

23

24

25

Daniela - direct - Penza

2345

1 DANIELA,

2 called as a witness, having been previously duly

3 sworn, was examined and testified as follows:

4 THE COURT: I remind the witness she is still under
5 oath.

6 MS. PENZA: Thank you, Your Honor.

7 DIRECT EXAMINATION

8 BY MS. PENZA: (Continued.)

9 Q Daniela, when you were in the admin office were you aware
10 that there was cash kept in the office?

11 A Yes, I was.

12 Q How did you come to learn that?

13 A There was a specific procedure that I was explained it.
14 That's how I knew and I saw it. So since I was processing the
15 applications for the students for the intensives and the
16 classes, then I knew the different forms of payment. And, so,
17 some of the them paid by credit card, debit card, some of them
18 paid by check and some of them paid with cash. So the
19 applications that came in with cash I had instructions to
20 enter in a particular way into the system.

21 Q Okay. So your job at this point in time balanced with
22 doing the brainteasers or the puzzles, but your job is to
23 enter the data from these applications onto a system; is that
24 right?

25 A That's right.

Daniela - direct - Penza

2346

1 Q And there are specific ways to enter different things?

2 A Yes.

3 Q And one of these is the method of payment?

4 A Yes.

5 Q And what would you enter when somebody paid with a credit
6 card?

7 A Payment by credit card.

8 Q What other types of -- what if someone paid by check?

9 A Payment with check.

10 Q What happens with somebody's pays with cash?

11 A Then we do not enter it as cash. Even though there is a
12 category called Cash, we entered it under the category
13 Scholarship Admin.

14 Q What happens to the cash?

15 A The cash gets put in the top right drawer of Karen
16 Unterreiner's desk in the admin office.

17 Q Was that money eventually moved somewhere else?

18 A Yes. Every random period of time Karen would come and
19 get that cash and take it away.

20 Q What was the point of entering it as a scholarship
21 instead of as cash?

22 A The point was to not pay taxes on the cash. So the cash
23 would not be on the books.

24 Q And, so, the people who paid the cash did not actually
25 receive scholarships?

Daniela - direct - Penza

2347

1 A That's right.

2 Q So did there come a time when you did take money from the
3 office?

4 A Yes.

5 Q Can you explain?

6 A I stole \$6,000 from the admin office where I was working.
7 I have no excuse for it. I was not raised that way. It was a
8 stupid decision; a stupid, impulsive decision and I felt
9 terrible about it so I put the money back right away, but the
10 feeling of guilt was consumed me.

11 Q Do you remember approximately when this happened?

12 A Yeah, I was about 17. So somewhere 2003.

13 Q Early on in your dialogue with your defendant; is that
14 fair to say?

15 A Yes.

16 Q Now, how long did you keep the \$6,000?

17 A Maybe a day.

18 Q How did you feel while you had it?

19 A I felt -- I felt paranoid. I was looking everyone to see
20 somebody had noticed, was looking at me. I felt everybody
21 could see right through me. My heart was racing. I couldn't
22 sleep. I felt really bad.

23 Q And you said you put it back?

24 A Yes.

25 Q You put all of it back?

Daniela - direct - Penza

2348

1 A Yes.

2 Q At that time did you tell anyone?

3 A No.

4 Q Eventually did you tell someone?

5 A I told one person.

6 Q Who was that person?

7 A I told Keith.

8 Q Why did you tell the defendant?

9 A Well, even though I had put it back, I was struggling
10 with -- I felt really bad still. I had stolen some money and
11 I didn't think I had that in me and so I think I wanted to
12 tell someone to -- I don't know, to, like, for some kind of
13 relief. I told him because, I mean, he was -- he was a person
14 that I had started to trust. We were building a friendship.
15 That's how I saw it and also because of this thing that I felt
16 inside of me, I thought he would maybe help me bring some
17 clarity.

18 I mean, he was, you know, the Vanguard, the creator
19 of all of these things; knew human nature, I thought, better
20 than most. I think I did it trying to feel better, trying to
21 find a way to understand what I had done. Also, like, like to
22 confess, I guess. It was that kind of a desire.

23 Q So you did tell the defendant?

24 A Yes.

25 Q Do you remember where you were?

Daniela - direct - Penza

2349

1 A No.

2 Q Do you remember what he said to you?

3 A Yes.

4 Q What did he say to you?

5 A I remember he was -- there was definitely a sense of
6 gravity to the subject. So in no way was it a light
7 conversation, but he was very, I felt, neutral. It was very
8 understanding. So it wasn't, oh, how could you do this and a
9 disciplining act like I would expect from my parents or
10 something like that. It was an exploration. Well, why did
11 you do this. Well, what -- and there were a few things that
12 were notable.

13 The first thing is that the first reaction -- the
14 first reaction out of him was that he already knew that. That
15 was very surprising to me. So, I told him I had done this
16 thing and he tells me he already knew that.

17 Q What did you understand that to mean, that he already
18 knew?

19 A I thought that he had eyes everywhere and he knew
20 everything that came and went, but I have to say I didn't
21 believe him. He said that, but I didn't believe that was
22 true.

23 Q Was your impression that he was conveying that he knew
24 everything in a mystical sort of way?

25 A Yes.

Daniela - direct - Penza

2350

1 Q Is that something that would come up later on as well?

2 A Yeah, that that's what he meant was reaffirmed by, you
3 know, my later understanding of him.

4 Q Okay.

5 A So, I now do believe that that's what it was, but at the
6 time I knew it was not true.

7 Q Did you confront him with the fact that you knew that
8 wasn't true?

9 A No. Confronting is this -- I don't think -- no, I -- I
10 wasn't in a position to confront him in any way. First of
11 all, because, you know, it was like a mentorship relationship.
12 So I wasn't -- I don't think I had it in me. I barely had it
13 in me to talk to him. But also in that conversation in
14 particular, I didn't think I had the right to confront anybody
15 on anything. Here I was confessing something that I did
16 really wrong that was really bad. I wasn't in that mindset at
17 all, but I definitely disagreed.

18 Q You made a gesture with your hands where you put one hand
19 about the height of your head and one basically right above
20 your chest. What were you intending to indicate by having
21 your hands in that way?

22 A Well, when you're -- when you have a relationship, maybe
23 when you're, like, friends with someone and you're equals, I
24 see it as being at the same level. And the relationship I was
25 developing with him was not one between equals. So that's why

Daniela - direct - Penza

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1 I said, well, it was a friendship to me. That's what I
2 thought it was.

3 But really it was one of, at least in intention,
4 mentor/student, but certainly beyond that. It was Vanguard
5 and a student. So he knew better. So in the scheme of things
6 he knew better. He was better. I was here. He was unified.
7 I was disintegrated. You could put it so many different ways
8 but it was definitely up and down.

9 Q What else did he say after you told him that?

10 A We had a very, I would say, colorful conversation that --
11 I will say made me feel better and not -- it wasn't like a
12 feel-good conversation. He actually, I thought, was
13 understanding and hit my concerns about myself, about the core
14 of myself, which is exactly what had been troubling me. And
15 he says to you, like guiding, things because okay -- I felt --
16 for example, I felt, well, I've done this thing -- yeah, I put
17 it back, but why does it still bother me. Because it's as if
18 you have a blank page and you stain it. You can't erase it.
19 It's going to be stained forever. Now I'm a person who stole
20 forever. I can't undo that. I did it, I can't undo that and
21 I felt -- it's a bit dramatic, but I felt ruined. I wasn't
22 this honest person any other.

23 And he addressed that and he said, yes, you
24 cannot -- you cannot get that back, but that's the nature of
25 things. It's like when you lie, you now know that lying is a

Daniela - direct - Penza

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1 possibility. So you stole. Now you know that stealing is a
2 possibility. Now, you can leave that the way it is or correct
3 it -- and you correct it.

4 And he said this which I thought was interesting,
5 you know, you could actually be a better leader of people
6 because now you know what it's like to steal and choose not to
7 steal and you can speak about it. You can speak to it because
8 you now know more than someone who has never done it.

9 Q Did he say anything else in that conversation?

10 A Yes. I mean, it was a lengthy conversation. It was an
11 important conversation. He said -- what I -- other than that
12 I don't remember exact things but what I took away from it was
13 that it wasn't the end of the world; that it was about what I
14 did with that, knowing that I had done that from then forward.
15 So I did feel a degree of relief and a little bit of more calm
16 and understanding about myself.

17 Q What happened next?

18 A What happened next is shortly after that and I think --

19 Q Let me ask you this. I'm sorry, Daniela. Did you think
20 the conversation was over?

21 A Yes, yes. I mean, I thought -- yes. More than the
22 conversation, I thought the -- yes, more than conversation, I
23 thought like that was the extent of the issue. And I will
24 explain it in terms of what happened next.

25 Q Okay. Thank you.

Daniela - direct - Penza

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1 A It wasn't over. I thought that conversation was, so I
2 confessed, we talked about it and, you know, the conversation
3 was very focused into myself like internally, internal work
4 that I needed to do to understand. But I thought it was over
5 because I took the money and I put it back. You know, that
6 external, I stole money and I put it back was done. That part
7 was done. There was nothing to be done about that.

8 All of it was about me. What do I do about this
9 thing that I was capable of doing that. I was capable of
10 breaking. I was mistaken. What happened next was he -- and I
11 think it was a phone conversation he called me and he said --
12 you know, he explained to me that he needed to -- I needed to
13 talk to Karen and he needed to tell Nancy and that it was
14 going to be difficult, but he was going to be there for me
15 throughout and at the end.

16 And I was like, okay, and he said, you know, there
17 are consequences to your actions, you know, beyond that, but
18 it was -- it was a friendly conversation and he said he was
19 going to be there for me. That it was going to be difficult
20 but it was essentially good for me, important for me, and he
21 was going to be there at the end. So I was -- I was taken
22 aback and what happened next was hell. It was hell.

23 So I did speak to Karen. Nancy spoke to me and had
24 these, like, sessions of, like, questioning and how are you
25 going to fix it and I remember being completely confused, you

Daniela - direct - Penza

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1 know, as to how to fix something that was already fixed. So
2 it's not like -- do I need to pay more money back? Is there
3 going to be interest? It was something that I could not
4 understand and it was aggressive and it was -- it felt like a
5 punishment to me which what I did was really wrong so I took
6 it. Like, I took all of it and that's what I deserve.

7 And there was some kind of an intensive where there
8 was, like, some extra-modular that particular afternoon that
9 happened. Not only what I did was bad, it was bad and I felt
10 shame because I did something that was really bad, and I -- so
11 I was part of this module and breakout group that was helping
12 me at the time and in the middle of the breakout group I
13 remember it was Barbara Jeske who was leading the discussion
14 and at some point turns to me and said, So, what do you think,
15 Daniela? How does that relate to your stealing the money?
16 And I was -- so, how does she know? Did they tell everyone?
17 And, they did.

18 So this -- and I didn't at the time -- at the time I
19 took all of it. I thought this is a punishment I deserved
20 somehow. This is going to make it better. I have to go
21 through this like he said and it -- but it was horrible. They
22 spoke to my parents. My parents, like me, felt horrible
23 shame. I mean, I -- they didn't raise me to steal money. My
24 father is the opposite of that. My father is a very honorable
25 man who always threads through the -- he never cheats. He's,

Daniela - direct - Penza

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1 like, super straight. He's almost square, too straight. And
2 I felt horrible because when they talked to them, Nancy spoke
3 to them, they -- it was humiliating to them.

4 Because, like me, they felt that their daughter had
5 stolen and they took it. They just took that thing that was
6 happening that felt like punishment that was punishment and it
7 was terrible.

8 Q How many other people in the intensive seemed to know
9 what you had done?

10 A About a dozen people. Way more than one.

11 Q How did that make you feel?

12 A Exposed.

13 Q Did Nancy Salzman use any terms to describe you?

14 A Yes.

15 Q What happened.

16 A I had several conversations in that afternoon/night with
17 Nancy. And she was talking to me pretty aggressively and I
18 know that I -- when I got nervous sometimes I react in a -- I
19 get nervous I'm, like, off. And I remember them screaming at
20 me why are you smiling? Is this funny to you? Does this make
21 you happy? You are suppressive. That was drilled into me. I
22 was freaking out. I was very nervous. I didn't think I was
23 smiling. And I was wondering to myself maybe -- maybe that's
24 why I stole the money because maybe I am a suppressive.

25 Q What is the idea of an suppressive?

Daniela - direct - Penza

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1 A In ESP -- and I must clarify that that's what I thought
2 at the time. I don't think I'm a suppressive. I was confused
3 at the time. In the ESP intensives, a suppressive was a
4 person who was cross-wired. So, in a very simplistic way, a
5 normal person they see something good, they feel good. They
6 see something bad, they feel bad. So they see a little baby
7 laughing, oh, that feels good. You see the baby being hurt,
8 oh, you feel bad. A suppressive is someone who has that
9 crossed. They may see something good in the world and they
10 feel bad so they want to squash it. That's how it was
11 explained.

12 Q So they think bad thoughts about the happy baby?

13 A Yes, in essence.

14 Q This concept of people being suppressives or acting
15 suppressively, was that something that would come up
16 frequently?

17 A It was centric to the idea of -- it was centric to the
18 understanding of the world in ESP terms because it was really
19 a suppressive towards a stronger world. It was all of us
20 through our disintegration and suppressive tendencies which we
21 all have, according to ESP. Then there were people who were
22 full-on suppressives and they call that taking the fall. If
23 there's a threshold where you have all of these suppressive
24 tendencies and you cross this threshold and apparently here is
25 where you lose your conscious and so now you are fully

Daniela - direct - Penza

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1 suppressive and you turn to the dark side, I suppose.

2 Q Is it fair to say that at the time when you were having
3 this conversation with Nancy that that was a real fear, a fear
4 of being a suppressive?

5 A Yes. And being called a suppressive was a serious
6 accusation.

7 Q And were other people in the community afraid of being
8 labeled as suppressives or afraid of being suppressive?

9 A Yeah. I think nobody wants to be called bad.

10 Q Did you ever hear -- did you ever hear other people
11 actually being called suppressives?

12 A Yes.

13 Q Who were those people?

14 A There was a person who was actually mentioned in
15 intensives. Her name had been Toni Natalie. She took the
16 fall and was a full suppressive.

17 Q Did you ever meet Toni Natalie?

18 A No.

19 Q Anywhere else that you heard that name used or that term
20 used?

21 A Yeah, I'm sure, but not that I can recall exactly.

22 Q Okay. So you have -- so this intensive is going on.
23 Your parents are spoken to, what happens next?

24 A I was fired from my job in the admin office. I think
25 that was fair. And, well, I had this series of, like, you

Daniela - direct - Penza

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1 know to fix it, what I needed to do which was all very
2 confusing. I took it more as a -- as a period of punishment
3 because it wasn't clear to me what else I could do to fix it
4 other than, you know, putting back the money, you know.

5 Q This notion that you had to fix something, was that
6 something that would come up repeatedly during your time in
7 ESP?

8 A Yes. And it was refined further and eventually called
9 healing your ethical breach.

10 Q And when that would happen, would there be -- would
11 anyone ever explain to you what you needed to do to fix it?

12 A No, not exactly. In fact, it was part of -- part of the
13 ethical breach was you needed to figure out yourself or at
14 least that's how it happened to me. I can't speak to, like,
15 the rest because I became progressively isolated from the
16 community and I didn't have contact with these concepts
17 firsthand. I wasn't taught them. I just was disciplined with
18 them.

19 But, so, the idea was that -- so a person -- I
20 commit an ethical breach, something that breaches my own
21 ethics. But that nonetheless has damage, physical damage to
22 the world and I use physical damage lightly. Everything has
23 consequences. So the ethical breach was like something
24 exploded and it changes everything else so there's no way to
25 contain that and one must figure out what it takes to fix it,

Daniela - direct - Penza

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1 you know, to contain all the ripple effect of all of those
2 things.

3 And there were, like, a series of steps. You needed
4 to make an ethical breach plan. So what are you going to do
5 to counteract each of the salient negative effects and you
6 make a plan of what it's going to take. And at some point it
7 was, well, you're not the one who can approve your own ethical
8 breach. You have to go to the people who you have damaged and
9 they will tell you it's enough or not enough. It's not up to
10 you and so on and so forth.

11 Q So going back to this incident after you -- after Nancy
12 speaks to you, so, you lose your job in the admin office, but
13 you weren't being paid for that; correct?

14 A No, I wasn't.

15 Q But what are you doing with the time that you have?

16 A I -- I am looking for odd jobs and -- I'm looking and I
17 find odd jobs. And I was running errands for people. I
18 worked as an assistant to a real estate agent. I was dog
19 sitting, housesitting, taking dry cleaning. I was looking to
20 make a buck so I could, you know, continue surviving.

21

22 (Continued on the following page.)

23

24

25

Daniela - Direct - Penza

2360

1 BY MS. PENZA (Continuing):

2 Q What was the name of the real estate agent?

3 A Franca DiCrescenzo.

4 Q After this conversation with Nancy and everything that
5 happened there, how did your relationship with the Defendant
6 change?

7 A I became closer to him. What he said was true and he was
8 there for me throughout and at the end. I would say he was
9 sort of a shoulder to cry on.

10 So, at the time, he felt like the only person who
11 was on my side, in fact, because I felt like that hell I went
12 through, I felt, you know, everybody thought I was bad. And I
13 just -- I took it, like I said, and he was -- he didn't adopt
14 that stance. He kept being my friend. He was understanding.
15 I would talk to him about how I felt about this, like, wave of
16 punishment coming at me. And he was there for me.

17 Q Looking back, do you have any thoughts on what happened
18 in that incident?

19 A Yes.

20 Q Can you explain?

21 A I think he set it up. I think he set me up. I think
22 that he made himself the hero of the story. He created a
23 horrible situation by which I became closer and a little more
24 dependent on him. And I believe that -- it's my belief that
25 that whole situation was crafted.

Daniela - Direct - Penza

2361

1 Q And you said this is in 2003, right?

2 A Yes.

3 Q And just to situate things, earlier you told us that you
4 end up having sex with the Defendant on your 18th birthday, in
5 October 2003.

6 A Yes.

7 Q So, this incident is happening only months before you end
8 up having sex with him?

9 A Yes, it all happened very quickly.

10 Q When you were -- at this point, you're on the visitor's
11 visa, correct?

12 A Yes.

13 Q So, can you explain a little bit about how the visitor's
14 visa works and what you typically would do when you're on a
15 visitor's visa?

16 A Yes. The visitor's visa that the U.S. issues to
17 foreigners allows for us to stay for a maximum period of six
18 months. Sometimes it can be issued for less. Like, if one
19 crosses the border and says, I'm going to come back, I'm just
20 going to this event in 20 days, then you might get this, like,
21 little paper -- I-94 I think -- stamped with less days. But
22 the general rule is they will give you that and it's
23 automatically six-month allowance.

24 And what I was doing, I was coming into the country,
25 staying close to six months, really cutting it very close,

Daniela - Direct - Penza

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1 like by days, and going back to Mexico for a little while to
2 essentially renew it, and come back in and again maxing out
3 close to six months and going back.

4 Q Now, during the times when you were home in Mexico, would
5 you communicate with the Defendant?

6 A Yes.

7 Q How?

8 A I would communicate with him by a little bit by phone and
9 by e-mail.

10 MS. PENZA: Your Honor, the Government moves into
11 evidence Government Exhibit 1580 on consent of the defense.

12 MR. AGNIFILO: That's correct.

13 THE COURT: Sorry, what's the number?

14 MS. PENZA: 1580.

15 THE COURT: All right. No objection?

16 MR. AGNIFILO: That's right, Judge.

17 THE COURT: All right. Government Exhibit 1580 is
18 received in evidence.

19 (Government Exhibit 1580 so marked.)

20 (Exhibit published to the jury.)

21 Q Daniela, I'm showing you what's marked as Government
22 Exhibit 1580.

23 Do you recognize this?

24 A Yes, I do.

25 Q And this is a forward that you sent to the Defendant

Daniela - Direct - Penza

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1 later on; is that right?

2 A That is correct.

3 Q But what is the actual document that you're forwarding?

4 A It's a series of e-mails.

5 Q And e-mails between who and who?

6 A It's communication between Keith and I.

7 Q I'm going to show you the first e-mail.

8 Can you see that, Daniela?

9 A Yes.

10 Q Is that better?

11 A Yes, thank you.

12 Q So, the first e-mail, it says from Daniela and then it's
13 to e-mail address kunterre@nycap.rr.com.

14 Are you familiar with that e-mail address?

15 A Yes. That was the e-mail address that Keith used. Even
16 though it spells out really kunterre, which is Karen
17 Unterreiner, it's the e-mail that Keith used.

18 Q Can you explain this e-mail?

19 A Yes. So, this particular e-mail is I'm sending Keith the
20 answer for one of the brain teaser's he had given me.

21 Q This is the answer to a brain teaser, and then you sign
22 it.

23 How do you sign it?

24 A I sign it TQM besos, Dani.

25 Q What does that mean?

Daniela - Direct - Penza

2364

1 A "TQM besos" would be the way every teenager in Mexico
2 signs off a letter to a friend.

3 Q Literally does it mean I like you --

4 A I like you very much. Kisses, Dani.

5 Q Would this be a common way of signing e-mails?

6 A Like XOXO or -- yes, something like that.

7 Q And then the Defendant seems to have responded from a
8 different e-mail account; is that right?

9 A Yes, that's right.

10 Q Is that another e-mail account of his that you're
11 familiar with?

12 A worldethics@hotmail.com, yes.

13 Q And that's to ladaniela@excite.com?

14 A Yes. That was my e-mail address at the time.

15 Q Is that an e-mail address you still have access to?

16 A No, I don't.

17 Q Have you tried to gain access to it?

18 A I did at some point, and I don't have access to it.

19 Q The Defendant writes back: I bolded something below.
20 What do you think?

21 And then a winky face.

22 A Yes.

23 Q Have you reviewed these communications?

24 A Yes, I have.

25 Q This document?

Daniela - Direct - Penza

2365

1 A Yes.

2 Q In general, how would you describe the back-and-forth
3 between you and the Defendant?

4 A I would say it was playful. I mean, I was being playful.
5 I think maybe it's a little uncharacteristic from a
6 fortysomething-year-old man, but it was a playful exchange.

7 Q At that time, what was the age difference between you and
8 the Defendant?

9 A I don't know exactly, but I was 17 and he was in his
10 forties.

11 Q Showing you another e-mail. This is July 1, 2003. It's
12 in the same series, and it's from Keith Raniere at
13 worldethics@hotmail.com to ladaniela@excite.com.

14 Does the Defendant write: It is better to write me
15 at the other e-mail, kunterre@nycap.rr.com. I am having
16 outgoing problems with that account, so I may write to you
17 from this one?

18 A Okay.

19 Q Is that consistent with him using that other e-mail
20 address?

21 A Yes.

22 Q And then he comments on something you had written in,
23 Bold this one, baby.

24 A Right.

25 Q And what does he say?

Daniela - Direct - Penza

2366

1 A Well, in an earlier e-mail, he had bolded something,
2 showing me that I had made a mistake. So, I replied back to
3 him and -- with what I thought was the correct answer, which
4 you can see below: What do you think? Oops, my mistake.

5 And I rewrite the series. And, so, I playfully
6 write, "Bold this one, baby," because I think this is the
7 right answer finally. I did make a mistake, but this is a
8 right answer. That's a little tongue out case, TQM -- this is
9 before emojis -- and then it cuts off to something he had sent
10 me.

11 So, the reply that he's giving me, "Bold this one,
12 baby," he is marking it with an arrow pointing to it, and he
13 says: Do you really mean it? Aren't you too young to be
14 doing this? Maybe not.

15 Q Looking back, do you have any thoughts on this e-mail?

16 A Yes.

17 Q What do you think?

18 A I think he was leading the conversation into a flirty,
19 more sexual way.

20 Q Is that consistent with how your conversations progressed
21 during this period of time in 2003?

22 A Yes.

23 Q Can you explain?

24 A Yes. So, I didn't see Keith in that way. I was being
25 playful. I thought we were, as I said, developing a

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1 friendship. But he would, I think in subtle ways -- I think
2 that's kind of subtle -- like, push the conversation towards
3 flirtiness, like flirting with me and asking that leading type
4 of -- I believe he was grooming me.

5 Q What type of questions would the Defendant ask you and
6 what type of information did he obtain?

7 A He would ask me all sorts of questions. And kind of
8 woven into all those questions were intimate questions. So, I
9 didn't make much of it. So, he asked questions about my life,
10 about my past, about what I wanted to do, had I ever been in
11 love, you know.

12 Q Had you ever had a boyfriend before this time in 2003?

13 A I was a bit of a late bloomer. So, before this time, I
14 had had a boyfriend with whom I was for two weeks and we had
15 held hands. But the truth is that by 2003, I had never been
16 kissed and I had never had any other type of sexual contact.

17 Q And was that something that the Defendant asked you?

18 A Yes.

19 Q So, he learned that you were a virgin?

20 A Yes, by that time he already knew all of those things
21 from me.

22 Q What else did the Defendant learn?

23 A He learned pretty much everything about me.

24 Q How did the Defendant -- did the Defendant have a
25 response at that time to you being a virgin?

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1 A Not that I can remember.

2 Q Later on, would the fact that you had been a virgin
3 become important to the Defendant?

4 A Very. He would come to call it I was "pure."

5 Q Now, at this point in time, what were your beliefs about
6 the Defendant's sex life?

7 A I thought he was celibate. I knew he was an
8 renunciant -- I had been told he was a renunciant. And I
9 believed in light with all of that he was celibate, he didn't
10 have any relationships of a romantic kind at all.

11 Q At this point, what did you think the Defendant's
12 relationship with your sister Marianna was?

13 A I thought he wanted to coach her. He was going to help
14 her be a tennis star.

15 Q At some point in time, your parents would be in the
16 Albany area on and off; is that right?

17 A That's right.

18 Q And did there come a time in this period where your
19 parents were in Albany?

20 A Yes. My parents actually moved for a period of a year.
21 They both came along with my two siblings, Adrian and Camilla.
22 So, they wouldn't miss a year of school, they actually
23 enrolled each in their respective grades in the hope...

24 Q So, the 2003-2004 school year?

25 A Yes, I believe that's the period of time they were here

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1 for a year.

2 Q And how was your parents' marriage at that point?

3 A It had deteriorated.

4 It was -- whereas before they were trying to figure
5 out what was going on with them, I think, that they were
6 happy, still living under the same roof, and they talked. At
7 that point in time, they were separated, essentially. They
8 lived in separate rooms inside the house that they were
9 renting in Riverwalk, and they -- my mom wanted to move out,
10 she wanted to not live with him anymore. My dad, I believe,
11 was heartbroken, very much loved my mother.

12 So, they both talked to me. Again, like, their
13 relationship continued to be good between me and each of my
14 parents, so I was -- you know, I was trying to navigate all of
15 this.

16 Q How was this discord or whatever was going on with your
17 parents, how was that effecting you at that time?

18 A It was one of the central issues in my life. It's my
19 parents, my family, was always, like, my main axis. And other
20 than caring about them as people, it's also my parents.

21 So, I don't think I ever stopped feeling that, so I
22 was very emotional. It was a very emotional, like, in a
23 negative way time.

24 Q Did you ever talk about this with the Defendant?

25 A Yes. I talked to him about everything, and this was one

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1 of the most important things. So, I definitely talked to him
2 about this.

3 Like with everything else, like with this one in
4 particular, I was hoping to get some insights that maybe would
5 allow me to help my parents. I felt like I had a super friend
6 that maybe could help.

7 Q Was there a particular incident where you discussed what
8 was going on with your parents with the Defendant?

9 A Yes.

10 Q Where were you?

11 A I was in the room next to Prefect's office. We were
12 sitting there on the purple couch -- there was a big purple
13 couch -- and the door was closed.

14 Q Was the door usually closed when you and the Defendant
15 were together?

16 A No, no. Usually, it was more open settings, public
17 settings. Even when we're at the center, it's not like the
18 door was closed behind us.

19 So, we were sitting there and I was telling him all
20 about my parents, my parents' issues. And he was, to a
21 degree, giving me advice: Well, if your mother -- I
22 understand that your mother might not want to be with your
23 dad, but if she doesn't know what she wants yet, what is it,
24 what has changed that they can no longer live under the same
25 roof? At least they could be friends.

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1 You know, it was just like, you know -- and I
2 considered his understanding of human nature to be at least
3 way better than mine. So, I was listening, but I was sharing
4 this very sensitive, very painful, very negative situation
5 that was happening in my life.

6 And in the middle of me sharing this with him, he
7 moved closer to me and he kissed me. He just kissed me on the
8 lips. And it was not a kiss that was reciprocated. I did not
9 expect it. I mean, I did not expect it in general, but it
10 also -- I was talking about my parents' divorce. So, I
11 just -- I froze. Yeah, I froze. It was -- it was -- it was
12 weird, it wasn't expected.

13 Q How would you describe the kiss?

14 A It was unwanted. And it was long. So, it wasn't like a
15 little peck. It felt like it intended to be passionate, but I
16 did not reciprocate. I didn't know what to do, honestly. And
17 I -- no. And it lasted a good few seconds and I just -- I
18 wasn't sure what to do.

19 Q Did the Defendant say anything?

20 A Yeah. I remember he asked me if I liked that he had done
21 that.

22 Q What did you say?

23 A I said yes.

24 Q Why did you say that?

25 A I froze. I had no idea what was happening. I just said

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1 yes. It was, like, a quick reaction.

2 Q What happened after that?

3 A The conversation, well, it was over with that. I left
4 and I drove home. And I remember, I was trying to understand
5 what had just happened.

6 And that kiss did not feel good the moment that he
7 kissed me. I froze. I didn't feel bad, didn't feel good,
8 didn't feel anything, it was just like what's going on?

9 As I was driving home and I was processing, I
10 started feeling almost like, Oh, my God, he likes me. He
11 likes me in that way.

12 And this thing started growing in me, like, How do I
13 feel? I feel flattered. I feel like I'm special. I feel
14 chosen.

15 And, you know, I started trying to understand all of
16 that, and it's almost like I started to feel a little excited
17 about it. Like, the kiss itself was -- I didn't ask for it.
18 I didn't feel anything and it was not something I wanted. But
19 I started to think about it and I started to figure out what
20 it meant.

21 And I remember I was driving home and I was thinking
22 I was telling my mom, about getting home and telling my mom
23 about it. And as a good thing. Like, it escaped me, what I
24 think now, how my mom would have reacted.

25 Because what ended up happening is I got home, my

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1 mom was there. She was by the river on the bench. And I
2 don't know why I decided to hold it inside me a little longer.
3 Like, I still didn't understand and started to feel almost
4 good about it, like, I started to feel almost excited about
5 it. And I just didn't tell her right away. I was going to
6 tell her; I didn't tell her right away.

7 But in between, I received a phone call from Keith
8 and, How are you doing? I think it's better if you don't tell
9 anybody about what happened, our kiss. I think that's better
10 that's between us.

11 And I agreed, I complied. So, I think that by a few
12 hours I would have changed the course of history because I
13 don't think my mom would have been very happy to hear that a
14 40-year-old something -- it doesn't matter if it's Vanguard --
15 kissed her 17-year-old daughter.

16 Q Did the Defendant explain to you why this had to be kept
17 a secret?

18 A Not that I remember. I just easily complied.

19 Q Had you ever kept a secret from your mom before?

20 A No, that was the first secret I kept from my mom.

21 Q Would you keep additional secrets after that?

22 A Everything about my personal life was a secret from then
23 on.

24 Q At that point in time, how did the relationship with your
25 mom change?

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1 A I became -- I came to see her, like, very apart from and
2 separated from me. Funny enough, it made me feel a little bit
3 more like a full independent woman, like I have my own private
4 life, but at the same time I was completely isolated from any
5 kind of objective, loving opinion about any question about my
6 love life or anything that was happening.

7 Q After that night, did you continue to communicate with
8 the Defendant?

9 A Yes.

10 Q Did the nature of the conversations progress?

11 A It escalated in a sexual way, definitely.

12 Q How so?

13 A I mean, now that I knew -- I mean, he had kissed me, he
14 liked me. There was flirting going on now, like, open
15 flirting going on now. And he, you know, he would lead -- I
16 was very shy. I mean, especially then I was extremely shy.
17 So, it took a lot of prodding to really move it that way. It
18 wasn't something natural. To me, it was uncomfortable,
19 flattering, uncomfortable.

20 So, the questions become more sexual and they began
21 to talk about, Oh, but we can't have sex because you're too
22 young.

23 You know, so, like, talk about sex but in the
24 negative, like we can't have it, which I understood perfectly.
25 And, so, that kind of...

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1 And the course of the conversations basically let me
2 in on his sexual life.

3 Q What did he tell you?

4 A He explained to me that he had -- that he did have
5 romantic relationships, that he had several girlfriends, that
6 there were long-term girlfriends, that privacy was very
7 important to him, that it needed to be a secret.

8 So, he let me in on his what he was doing.

9 Q Did the conversations about the way you described it as
10 the negative conversations about sex, would those continue and
11 escalate as well?

12 A Yes, especially as my birthday was coming up.

13 Q So, was your 18th birthday a trigger point?

14 Was that something that was being built up to?

15 A Yes, yes. It was built up by him and I understood it and
16 I followed on it.

17 And there was a particular conversation that
18 happened weeks, maybe a month or so, maybe a little more,
19 before. We were at volleyball. And after all this conversing
20 about, Oh, we can't have sex, you're too young. Your birthday
21 is coming up. What do you want for your birthday?

22 So, in my mind it was clear what the answer should
23 be: I should want sex. But I was too shy to even say that.
24 So, it took a lot of him asking in a flirty way, What do you
25 want for your birthday? Do you want something special?

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1 And I couldn't say it and I did not say it. And he
2 noticed I was extremely shy, and he said, Well, if you're too
3 shy to say it, why don't you write it on the palm of my hand?

4 And it was easier than to say it, so I, with my
5 hand, spelled out S-E-X.

6 Q What did the Defendant -- what did the Defendant say
7 after that?

8 A He acted surprised.

9 Q Can you --

10 A He said, Oh, you want sex?

11 And I remember feeling very insecure all of a
12 sudden, like, Oh, my God, that was not the right answer. Oh
13 my, God, I want sex? Who am I? That's so dirty.

14 I felt like -- yeah, like, you know, he set me up.
15 Like a little deer, he set up the trap, and when I fell he's
16 like, Oh, you fell in a trap.

17 So, after that, I was visibly shy, I know. I was
18 extremely mortified. And he said, Is there something that you
19 are insecure about, you know, about sex and all of that?

20 And I told him I was and I was insecure about my
21 body and I was insecure about I felt fat, I was fat, and I
22 felt insecure about my stretch marks that started appearing
23 after I gained weight suddenly. And he's like, Oh, that's all
24 right. But what about your pubic hair? Is that something
25 you're insecure about, the hair on your pussy?

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1 And I remember being really confused because I was
2 like how would I be insecure about -- like, but what, is the
3 hair too curly? Is it the wrong color? And he explained,
4 Some women are like insecure and don't like their hair. But
5 you know, I like natural.

6
7 (Continued on the following page.)
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1 BY MS. PENZA: (Continuing.)

2 Q So, at that time you weren't -- that wasn't even a
3 concept that you were familiar with?

4 A Which concept?

5 Q The concept of grooming pubic hair?

6 A No, one did not touch it.

7 Q So the defendant stated that his preference was for it to
8 be natural?

9 A Yes, that's what I understood.

10 Q Later on in time would the defendant repeat that that was
11 his sexual preference with you?

12 A Yes, he made that very clear.

13 Q In which ways?

14 A Well, I remember once he started having sex with me he
15 mocked me a little bit because he said I had very little hair.
16 And I did. I had very little hair. And he even -- he was,
17 like, well, you -- you shave it. You know how I like it. You
18 shouldn't shave it. No, that's the way I am. I'm young. I
19 didn't have a lot of hair and he nicknamed me Norelco because
20 Norelco is apparently this little machine with which you shave
21 hair. So he used to call me Norelco in a playful way. I
22 didn't like it. And then I really didn't like it.

23 One day we were at the volleyball court and he
24 yelled Norelco and I wanted to die. So I was very aware that
25 he liked it natural and through games and jokes and explicit

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1 directives I knew that there was no grooming allowed.

2 Q Going back to before you had had sex with the defendant,
3 did the defendant tell you anything you needed to do before
4 you had sex with him?

5 A Yes.

6 Q What did he say?

7 A I needed to lose weight.

8 Q Did he explain why?

9 A Yes. He said that -- he said that for him to share his
10 sexual, you know -- he was very sensitive to that because of
11 who he is. And, so, that when a woman was fat, overweight,
12 fat, that interrupted that energy and it sounded like
13 something that should make sense; like the body's fat/muscle
14 ratio was off so the energy didn't flow properly. But it was
15 also because a person who's overweight is obviously a person
16 who does not have control of their indulgent impulses. So
17 it's a person who is not -- it's like almost too primitive in
18 their way. They can't even keep themselves from eating so he
19 couldn't share his sexual energy with somebody like that. He
20 needed me to lose weight.

21 Q Would your weight become a focus throughout for the next
22 ten years?

23 A Yes, I was in sharp focus all the time. Sometimes when I
24 called him the first question would be, pick up the phone,
25 what is your weight.

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1 Q Did the defendant have a specific amount of weight he
2 wanted you to lose?

3 A Yes. I needed to lose so much weight and then there was
4 a midterm goal. You need to lose this much by here and then
5 we'll see how much you needed to lose. I needed to lose
6 20-something pounds and I needed to weigh 155 around for the
7 time of my 18th birthday.

8 Q Did you do anything to try and lose the weight?

9 A Yeah. I tried to diet. I took laxative pills.

10 Q How did you get the idea to take laxative pills?

11 A My sister Mariana had been taking them and I had seen her
12 taking them and I knew she had an eating disorder, but, you
13 know, she was -- that's where I got the idea.

14 Q So, remind us again, when was your 18th birthday?

15 A My 18th birthday was October 26, 2003.

16 Q And what happened?

17 A I turned 18.

18 Q Did anything else happen that day?

19 A Yes. That day, I'm sure, but I don't remember exactly.
20 I remember what didn't happen.

21 Q What didn't happen?

22 A What didn't happen is I did not have sex with Keith that
23 day. He -- I was disappointed. I was disappointed. I felt
24 rejected. I know that he was disappointed that I had not lost
25 the weight.

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1 Q Did you actually have a conversation with him about that?

2 A Yes.

3 Q What did he say?

4 A Why, do you not care about me? You don't care enough?

5 You care more about food than to be with me. And I felt bad.

6 I felt bad and so I didn't see him on my birthday and I didn't

7 see him for the following days but it wasn't more than a week

8 and I felt -- and I felt -- and I felt rejected over those

9 periods of those few days that I turned 18 and nothing

10 happened, but then he did call me and it was time.

11 Q About how much after your 18th birthday was this?

12 A It wasn't more than a week. It was days.

13 Q And, so, how -- what actually happened?

14 A He -- he called me and I don't remember whether I picked

15 him up or we met at this place called Rome Plaza.

16 Q Did you have an understanding of what Rome Plaza was?

17 A It was an office building. It was, like, an office

18 building and I don't know if I knew it at the time, but I

19 certainly found out later they were the former offices of a

20 business that he had had.

21 Q What happened when you got to Rome Plaza?

22 A So we got to Rome Plaza and he led me through the

23 hallways. I think it was the second floor at the end of the

24 hallway on the right way facing from the front. I think it

25 was, like, one of the last offices. And he led me in and

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1 inside that office there was, like, a smaller room, I think.
2 And that's where he led me and this room was, like, dim
3 lighting, so I couldn't see very well. There were stacks of
4 things. Like stacks of boxes, stacks of things and, like, on
5 the floor there was, like, carpet; like old, dirty carpet and
6 on the floor there was a mattress and the mattress looked like
7 a dirty mattress. It had, like, raggy, used sheets on it. It
8 wasn't like -- that bed wasn't made up. It was just, like --

9 And he asked me to take my clothes off and lay down
10 and I did. There was not much talking throughout. There
11 really was no talking. He didn't remove his clothes. He just
12 starting doing oral sex on me. And that went on for a while.
13 I don't know how long. I was a little bit in shock with
14 everything and then he took off his clothes and he climbed on
15 top of me for a little while and he gave me a hug, like a long
16 hug is what it was and -- and -- and then he just kissed me,
17 got up, helped me up and got dressed and I drove him back to
18 Flintlock.

19 Q Did you feel the defendant have an erection?

20 A No.

21 Q Did you feel the defendant penetrate you?

22 A No.

23 Q Was there any evidence that the defendant had ejaculated?

24 A No, no there was no kind of substance or anything like
25 that. Nor did I bleed.

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1 Q What happened next?

2 A What happened next was after I dropped him off he calls
3 me. And he calls me and he tells me, you know, I know that
4 you're too shy to talk when we're together. I know you're too
5 shy to talk when we're together so I'm calling you so we can
6 talk about what just happened.

7 Q And what did he say?

8 A He said -- he asked me how I was and how I felt about it
9 and all of these different things and one remarkable thing he
10 said was, you're responsible -- you're a responsible person.
11 How come you didn't ask me to use protection? And confusion
12 ensued because I couldn't understand why he was asking me to
13 use protection if I didn't feel he penetrated me. So I didn't
14 think we needed it and I understood that he was telling me
15 that he did penetrate me and I did lose my virginity, but I
16 did not feel that. So we were debating that point.

17 Q Did that continue to be a point of debate later?

18 A Yes. That's still a point of debate.

19 Q How did you feel about what had happened at that time
20 about him saying he had penetrated you when you hadn't felt
21 that?

22 A I feel very sure of what I felt. I was there. It's my
23 body so it's very confusing to have contradictory information.
24 I mean, I -- I'm -- I'm sure he didn't penetrate me then.

25 Q Would later he actually provide you with explanations --

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1 did you have a conversation later about why there was this
2 disconnect?

3 A Yeah, a few days later we were on a walk and we were
4 talking about this. He was asking me about this and he was
5 kind of having, like, an EM type of conversation, like an
6 exploration, like, you know, why do you think you didn't feel
7 anything? Like, clearly what he said was right and I needed
8 to figure out why I didn't feel it. I stuck to my guns. To
9 this day, I'm sticking to my guns and he --

10 So he was, like, doing this exploration with me and,
11 you know, by the end the concluding questions. So Daniela why
12 do you think -- why do you think that you would not, like, not
13 want to feel that? Why would you not, you know, not have felt
14 what happened? And I remember that all of this is going on
15 and, okay, I think I know the right answer to that and I will
16 give him the right answer and I gave what I thought was the
17 right answer and I said maybe I didn't want it and so I
18 blocked it out. I thought that that was the right answer.

19 He corrected me and he gave me the right answer. He
20 said, no, the reason why you didn't feel it was because you
21 were too in your head, which is an expression from ESP, when
22 someone is thinking but not feeling. You're too in your head
23 all the time. That's what you need to work on. That's why.

24 Q Were there later other instances where you would know
25 something had happened and the defendant would try to convince

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1 you that it had not happened?

2 A Yes.

3 Q Did you see that with other women as well?

4 A Yes.

5 Q Later on when you had additional sexual experiences with
6 the defendant, were there times when he had difficulty getting
7 or maintaining an erection?

8 A Yes.

9 MS. PENZA: Do we want to take the lunch break now?

10 THE COURT: Yes. Let's take the hour for lunch.

11 All right, please rise for the jury.

12 (Jury exits.)

13 (In open court.)

14 THE COURT: All right. The witness may stand down.

15 Do not discuss your testimony with anyone.

16 THE WITNESS: Yes, sir.

17 (Witness steps down.)

18 THE COURT: Take an hour for lunch. Thank you.

19 (Luncheon recess.)

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Proceedings

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1 A F T E R N O O N S E S S I O N

2 (In open court.)

3 (The Hon. Nicholas G. Garaufis, presiding.)

4 (Defendant present.)

5 (The following occurs outside the presence of the jury.)

6 THE COURT: I am advised that the last day of
7 Ramadan is June 4th. It's Tuesday. We're not here Monday.
8 We will not have trial on Tuesday, June 4th.

9 Does the Government anticipate that it is going to
10 need a Daubert hearing? Have you thought it or do you want to
11 advise me by next Wednesday whether you're going to request a
12 Daubert hearing on that one issue that I had in my decision?

13 MS. PENZA: I'm sorry, Your Honor. Can we get back
14 to you?

15 THE COURT: Yes, by next Wednesday. If we need it
16 we will schedule it, but otherwise we will not have court on
17 Monday, June 3rd or Tuesday, June 4th, and we will only that I
18 have court on the 5th, 6th and 7th in June in that week, three
19 days.

20 MS. PENZA: Okay, thank you, Your Honor.

21 THE COURT: The defense understands?

22 MR. AGNIFILO: Yes, we do.

23 THE COURT: I just wanted to give you plenty of
24 notice about that. Anything before we bring in the witness?

25 MS. PENZA: Not from the Government.

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1 MR. AGNIFILO: Not from us, Judge.

2 THE COURT: Okay, let's bring in the witness,
3 please.

4 (Witness resumes stand.)

5 THE COURT: Let's bring in the jury, please.

6 (Jury enters.)

7 THE COURT: Please be seated.

8 All right, you may continue your direct examination
9 of the witness.

10 MS. PENZA: Thank you.

11 THE COURT: The witness is reminded that she is
12 still under oath.

13 MS. PENZA: Thank you, Your Honor.

14 DANIELA,

15 called as a witness, having been previously duly

16 sworn, was examined and testified as follows:

17 CONTINUED DIRECT EXAMINATION

18 BY MS. PENZA:

19 Q Daniela, after the incident at Rome Plaza, what did you
20 think your relationship status was with the defendant?

21 A Actually, I was a little unsure. I knew that we started
22 a sexual relationship, but no terms as such had been
23 discussed. He had explained to me what it was like with other
24 of his long-term girlfriends, but as far as me and him, I
25 wasn't sure.

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1 Q And so, did you have a discussion with the defendant?

2 A Yes. I have -- I was raised and brought up with very
3 traditional conservative values. So, in fact, I -- and what I
4 always wanted was to be with one man, love one man and always
5 just stay with that man. Very traditional and very
6 conservative. So I wanted to speak to Keith about that. I
7 understood he took it seriously, but in terms of time what it
8 meant to me. So I sought a conversation with him to discuss
9 that.

10 Q And what did he say?

11 A He said we had already discussed that. That was the
12 three-year contract.

13 Q Had you ever heard that there was a discussion of a
14 three-year contract?

15 A I would remember it. This was my life. No we never
16 discussed three-year contracts.

17 Q How did it make you feel when he said three-year
18 contract?

19 A Well, it made me feel that he didn't remember the
20 conversations he had with me. I thought maybe he had it with
21 a different woman. Does he realize it wasn't me? I felt
22 really confused about the fact that we didn't have that
23 conversation.

24 Q And, so, what happened after that?

25 A So that wasn't resolved, but we did have a conversation

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1 about, you know, what the relationship was and that three-year
2 contract is not something I wanted. Like, it didn't go in
3 line with what I thought, you know a serious, formal
4 relationship should be. To me it seemed a bit like a rental
5 agreement. This was, like, three years of sexual relationship
6 and it's not the way I saw life.

7 So, in fact, it was me -- it was I who sought a
8 long-term, like a commitment of -- almost like a marriage. If
9 I'm going to do this and I'm going to have sex and that's a
10 serious thing for me I want it to be forever.

11 Q Did the defendant describe other relationships he had as
12 being life commitments?

13 A Yes.

14 Q Looking back, what are your thoughts on this life
15 commitment?

16 A Looking back, not even by the semantics or wording of it,
17 it was clear to me that he now owned me; that it was an
18 ownership thing, but it became clear to me that once the
19 commitment was made, it was an ownership of sorts.

20 Q Did the date -- the date when the incident at Rome Plaza
21 happened, did that become known as anything to you and the
22 defendant?

23 A Yes, that became our anniversary.

24 Q And I know you said you weren't precise on the exact date
25 but did you and the defendant pick a date that you used as

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1 your anniversary?

2 A I picked it. I thought it was comical. I picked the Day
3 of the Dead in Mexico which was somewhere in the range of --
4 because I didn't remember the exact date so I picked that
5 holiday and I said, okay, this is going to be it.

6 Q Did the defendant use the term anniversary with any other
7 women?

8 A Yes. I was aware of the anniversary date for Keith and
9 Pam which I know was February 14th. It's disturbing enough
10 that I was told the details of their first sexual encounter.
11 As I was told, a ski trip in one cabin and it was the first
12 time they had sex and their anniversary was February 14th.

13 Q So, what was the anniversary in general tied to?

14 A The first time when we had sex with Keith.

15

16 (Continued on the following page.)

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1 (Continuing)

2 Q After the Rome Plaza incident, did you continue to have
3 sexual encounters with the defendant?

4 A Sexual encounters, yes. So sex, intercourse, didn't
5 happen like after that until maybe like, six months after, but
6 the -- after the Rome Plaza incident, after that, there was
7 other sexual contact, just wasn't mutual, I would say.

8 So I -- shortly after that, I was in Flintlock with
9 Keith, and he was laying down in the way we would usually sit,
10 and other women sat when they were there. He was laying down
11 on the couch and I would sit like by his feet, by his knees,
12 and he would put the knees on top of my legs.

13 And we're sitting there talking and he, in
14 conversation, this and that, and he pulled his pants down and
15 you know, showed -- showed me his penis. It was the first
16 time I saw one of those, because I hadn't seen him -- I hadn't
17 seen his body in Rome Plaza.

18 And you know, I don't remember exactly what words
19 were used, but basically, you know, I -- he had me give him
20 oral sex. And so I did.

21 And -- and it's the type of sexual contact that
22 continued and was more often between us.

23 Q What was you refer to Flintlock, what address are you
24 referring to?

25 A It's a -- 3 Flintlock Lane.

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1 Q And what was that? Who was living at 3 Flintlock?

2 A At 3 Flintlock Lane there was -- I believe the actual
3 condo was owned by Karen Unterreiner and living there were
4 also Pam Cafritz, Kristin Keefte, and my sister, Marianna, and
5 Keith.

6 Q When did you start gaining access to Flintlock?

7 A Immediately after I had sex with Keith. Sex meant access
8 when it came to Keith.

9 Q After the time you described, how frequently would the
10 defendant have you perform oral sex with him?

11 A Well, that -- that first time he -- I thought he liked it
12 because what he said to me was where did you learn how to do
13 that? You know, which, to me, felt like really offensive
14 because I -- he knew I didn't been with anybody else. But it
15 became a daily thing. Sometimes it was like more than once a
16 day. It was all the time.

17 Q Did the defendant have a specific place in the house
18 where he would typically have you do that?

19 A Yes. In the downstairs, in the living room, which is
20 like an open concept condo living room. It would be in two
21 places in that living room. It would be on the couch. He
22 would be laying down and I would be doing that, or it would be
23 on the rocking chair that was -- it was a little bit in front
24 and to the side of the couch. And the rocking chair was
25 facing the TV and a little monitor. So he had a little

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1 monitor that connected to a camera that was pointed to the
2 front of the house, the driveway, so that he could see who was
3 coming.

4 So whenever he came into the house and I was there,
5 he would just like, you know, say a little something, drop his
6 pants, sit on the rocking chair, have him -- have me give him
7 oral sex, and he would be watching the monitor to make sure
8 that nobody was coming in or, in this case, also like just
9 looking at the stairs, to make sure that nobody who was
10 upstairs would be coming down.

11 Q After the Rome Plaza incident, did you have any other
12 discussions about contraception?

13 A Yes. At some point later, maybe perhaps after the second
14 time with we had sex, I brought up the issue of, you know,
15 I -- I was -- I was irregular. I had always been very
16 irregular with my menstrual period; not a little irregular,
17 very irregular.

18 So I would get my period and maybe -- as opposed to
19 like month to month, like three months, and I would get my
20 period. And then maybe the next time would be a month; maybe
21 next one would be even up to six months. So it was completely
22 out of whack.

23 My -- my -- I wasn't regular at that time at all.
24 So I suggested I should go on the pill. And he didn't think
25 that was a good idea. He said that I should not go on the

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1 pill. And the reason that he gave me was that the hormone
2 change that the pill causes in women makes them gain weight,
3 and I already was overweight. So he said why don't you just
4 lose the weight and once you lose the weight, we'll see about
5 that.

6 Q Did the defendant give you any other directives regarding
7 sex?

8 A Well, there was the losing weight. There was all the
9 contraception. And -- oh, yes. So at some point we -- there
10 was actually a couple of things.

11 So at some point we, you know, when we had the oral
12 sex was never mutual. It was never reciprocated. Was always
13 just one way. There was no other affection or kissing or
14 nothing, so. And the sexual encounters were -- were few, but
15 when he did have sex with me, sometimes he would ask, you
16 know, how it felt, you know. What it would take for me to be
17 able to come and things like that. And I didn't know.

18 He, you know, he would ask me and I would tell the
19 truth; that I never had an orgasm and we discussed that. And
20 he said that I couldn't have an orgasm, like after -- like
21 questioning me, well, have you ever had an orgasm and I had,
22 with myself, through masturbation.

23 He said that's why you can't come with me. It's
24 because you are masturbating. So he gave me the instructions
25 not to masturbate.

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1 Q I think you talked a little bit earlier about the
2 defendant talking about energy transfer regarding sex; is that
3 right?

4 A Yes.

5 Q Did the defendant speak about sex in a mystical way in
6 any other regards?

7 A Yes.

8 Q Can you explain?

9 A So with regard to sex, there was this -- well, as I said,
10 there was like -- the weight and, you know, how that connected
11 to his energy, which to me, that is mystical in nature.

12 There was also the reasons why -- well, among the
13 reasons why -- well, among the reasons presented why he could
14 have sex with other women, but I, for example, could not have
15 sex with other men, is because that would hurt him. So that
16 meant we had some kind of a connection through sex; that if I
17 had sex with someone else, he would feel it. But it wasn't
18 just then an effect. It would this connection would hurt him.

19 There was also -- well, the first time that he had
20 me give him oral sex, I remember -- actually, I -- I,
21 obviously, I didn't know what I was doing. I didn't know
22 that, you know, what to do with the semen. I didn't know that
23 there was an option what to do.

24 So, I -- once I swallowed it, he asked me, did you
25 see a blue light? And I was -- I was -- I was -- I was -- I

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1 remember I looked to the ceiling by the -- by the lamp, and I
2 was like, no, I didn't see a blue light. So, oh, some women
3 have told me they see blue lights when they have, you know,
4 had my semen, which it was like this mystical thing of this
5 property, his sex and semen had.

6 Q And did he say -- did the defendant say anything to you
7 about the fact that you had not seen the blue lights?

8 A Yes. He said it probably was because I wasn't very
9 sensitive. Like I wasn't connected with that part of things.

10 Q Have you ever heard the defendant use the term working
11 with someone?

12 A Yes. Working with someone or taking someone on. Yes,
13 I've heard it.

14 Q And what would that mean?

15 A That means that he has started having sex with someone as
16 a way to help them grow.

17 Q Can you elaborate a little bit.

18 A Well, I guess that's another -- yeah, mystical thing of
19 sorts, of -- pretty straightforward.

20 So he -- he said that when he has sex with someone,
21 it, you know, if, you know, if the woman is doing her program,
22 if a woman very specifically is in the right weight and is
23 following her program, then having sex with her, he can fix
24 disintegrations by the mere act of sex.

25 Q Apart from sex, were there any other references to the

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1 defendant having any other sort of mystical powers?

2 A Yes. I mean, there were many. Many that were
3 disseminated through the community, who I heard from people
4 other than Keith. I heard them talking about them, even when
5 Keith was present, but I heard some of them also directly from
6 him.

7 So, for example, he once recounted to me that when
8 he was a child, he was sitting in his living room, or
9 something like that, with his back to the TV and he could hear
10 like the newscaster and he realized that just by hearing his
11 voice, he -- he could -- he could see what he was wearing. He
12 could feel what he was feeling. He could know what he was
13 thinking so that he had like this super power. And he
14 realized it when he was very young.

15 He also said that he could see like people's
16 disintegrations and their weaknesses in their body. And he
17 said that to me directly, which I found very disconcerting.
18 I -- I -- I didn't believe him, and I found it very confusing
19 because the reason why I admired Keith and respected Keith was
20 because I thought he was the smartest man in the world and --
21 as far as the intellectual. And that, to me, all that
22 mysticism, if not in contrary, at least it's not in line with
23 what I believe science is.

24 So I did confront him about things like that. The
25 things that he said as well as him allowing people to

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1 disseminate those stories and permit it to continue, because I
2 found it went against what he stood for and what the company
3 or like the mission stood for.

4 Q At some point after you started having sex with the
5 defendant, did you learn that your sister Marianna was also
6 having sex with him?

7 A Yes.

8 Q Do you remember how you learned that?

9 A We spoke to each other, yes.

10 Q So what happened after that?

11 A So I don't remember exactly when it was, but I remember
12 we had a conversation once we -- I was having sex with Keith.
13 She was having sex with Keith. I think she had been having
14 sex with Keith for a longer period of time. So we had this
15 conversation shortly after I had the first sexual encounter
16 with Keith.

17 And you know, this was Marianna, my best friend in
18 the entire world. So and it was -- it was -- it was weird.
19 It was sort of horrifying that we were having sex with the
20 same man and he told -- she told me that she was in love with
21 him. And I believed -- I believed her. I believed that. Or
22 at least that that's what she thought, I believe that.

23 And I -- I told her that -- how I felt. I told her
24 that, you know, I -- I also wanted to be with Keith and that I
25 thought he was a great man and that to do like things

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1 together. And we talked about, you know, how we both knew
2 about his lifestyle, but it was definitely problematic. It
3 was definitely like it was not -- like we needed to talk about
4 that. That was not -- that was not something that was right
5 with either of us and so it needed to be figured out. And
6 we're like, what are we going to do here?

7 So we -- we talked about it and we decided we could
8 maybe handle it, but we needed to set some ground rules;
9 right? Like, I don't know, just land that huge, horrible
10 thing.

11 And -- and so we ended up going, okay, it all
12 happened like in one -- in one -- in one -- in one day and
13 so -- we're like, okay, let's go get a cup of coffee and let's
14 write down, you know, that just -- what -- what -- what --
15 what is going to happen here. What are we going to --
16 that's -- I don't know I'm thinking about it now and it's --
17 it just goes to show that the -- the love in our relationship
18 and also, like, sort of strong impact and obsession that we
19 had with Keith, both of us.

20 But -- so we sat down. We went to the center. We
21 went to New Garner Road there. We went there to sit down, to
22 have a snack, and to talk things out, and write them down and
23 figure out what we're going to do. And we ran into Keith. We
24 were in the corner, almost by the admin office, where the big
25 TV was, and he show up, you know unexpectedly.

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1 And he asked us, what are you doing? What are you
2 guys doing? And sure enough, I told him. And he didn't seem
3 to like that. And he asked -- he started like asking a bunch
4 of questions the way, like, you know, he used to ask questions
5 that I understood were more like it's not okay that we're
6 doing this.

7 And no, stop the process. Took Marianna away.
8 Marianna left with him and we never spoke about it again.

9 Q You and Marianna?

10 A Not openly. Not about, hey, we're sisters and Keith's
11 having sex with both of us.

12 Q After you began having sex with the defendant, what
13 changed?

14 A A lot of things changed. My life changed. I had full
15 access to Flintlock, to him, to the inner circle. I was part
16 of the inner circle, automatically.

17 And, yeah, I mean, I had a degree of -- yeah, I
18 mean, I was part of the inner circle and everything that came
19 with that.

20 Q Did you begin spending more time -- is it okay if I use
21 Flintlock as shorthand for 3 Flintlock?

22 A Yes. Yes, because at the time I -- later in time I know
23 that Kristin Keeffe was living in 1 Flintlock. So there were
24 other Flintlocks. But during that period of time, there was
25 just the one Flintlock and we called it Flintlock.

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2401

1 Q What happened after you started spending time at
2 Flintlock?

3 A After I started spending time there -- well, I spent a
4 lot of time with Keith. I got to -- I was like a fly on the
5 wall. Like, I was in my little laptop computer on, like the
6 couch on the side, and people would come and go. I would just
7 be there minding my own business. He would be on the phone,
8 you know, planning things, talking about things, disciplining
9 people, you know, talking to people, arguing with people,
10 playing the stock markets, all these things, I was there. I
11 was spending my waking moments, all of them, at Flintlock.

12 So I was -- I felt I was Keith's friend. I felt
13 like his little buddy. I felt like a best friend. I felt
14 like he could be with women in front of me, I wasn't jealous.
15 I really wasn't.

16 And whenever he had free time, he'd go on a walk
17 with me. Every time he came into Flintlock and there was
18 nobody there, I know what my role was, you know. I was to
19 give him oral sex.

20 And so there was a lot of things I felt at the time
21 that we were doing together.

22 Q Did you start taking on any specific tasks regarding the
23 defendant, any specific jobs at that time?

24 A Yes. So I started -- at first everything -- so I felt,
25 obviously, I saw Keith as this like, I idolized Keith. I saw

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2402

1 Keith as this figure of like this great man.

2 I know, like I said, the smartest man, but I thought
3 so he's the smartest man, yes, but he is going to do some
4 great things and sometime in the future people are going to
5 wonder what was his life like.

6 So I decided I need to write things down. I need to
7 record this. This is historical of sorts. I felt it was --
8 that's the degree of admiration with which I saw him.

9 So at first I was just -- he would say things, I
10 would write it down on my computer, and would send it to
11 myself. And so like he cracked a joke, I would type it in my
12 computer. I would send it to my e-mail.

13 So I started communicating sort of what he was
14 saying, doing, that I thought was interesting or remarkable or
15 just like, things.

16 Later I also started recording. So he bought me two
17 tape recorders and eventually also like a small video camera,
18 so I'd be recording him when he was talking to people, when he
19 was talking to me, explaining some concept, and later,
20 videotaping. I was just videotaping him, riding the unicycle,
21 paying tennis, playing with so-and-so. So I started
22 documenting him.

23 Q We'll go into details later, but were there any times
24 when you were told not to document him?

25 A Yes. Whenever there was legal talk.

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2403

1 So, for example, if he -- if Kristin was in the
2 house, which tended to be sometimes a little meeting in the
3 morning, Kristin would come down for a coffee in her bathrobe,
4 curly hair, and that was when he would give her instructions
5 of like what was going to happen in the day. She would report
6 to him details about so-and-so, how it had gone, something
7 like maybe the day before, and he would give her instructions
8 of what to do next. That, I wasn't allowed to record.

9 I -- at first, he would tell me, but then I
10 automatically knew and so I just automatically stopped
11 recording.

12 MS. PENZA: Your Honor, the Government moves into
13 evidence Government's Exhibit 1501 on consent of the
14 defendant.

15 MR. AGNIFILO: That's correct, Your Honor.

16 THE COURT: All right. Government's Exhibit 1501 is
17 received in evidence.

18 (Government's Exhibit 1501 received in evidence.)

19 BY MS. PENZA:

20 Q Daniela, I'm showing you Government's Exhibit 1501. Are
21 you familiar with this?

22 A Yes.

23 Q And is this an example of some of the documenting type
24 work that you were doing?

25 A Yes. This is some of the early stuff, yes.

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2404

1 Q So can you just explain what this is?

2 A So this is, again, the e-mail I'm sending to myself. As
3 it reads in the subject" Keith's ideas on websites. So this
4 would be something that he was talking about and as he's
5 talking about it, I'm there typing it. And so that's what it
6 is.

7 Q And now do you remember what all of these website ideas
8 were?

9 A Not all of them. Some of them. Like, I mean like the
10 video dancing is pretty self-explicit as well as the
11 postsomeoneelsessecret.com.

12 Q What did you understand postsomeoneelsessecret.com to be?

13 A Well, that idea, I do remember. It was to be a website,
14 an interface, where anyone could go and anonymously post a
15 secret they had learned from someone else, either accidentally
16 or that they had been told.

17 Q Did you understand why -- did the defendant explain why
18 he wanted that website?

19 A I think that there was supposed to be some comedy or
20 entertainment in exposing them.

21 Q Did this e-mail -- it's sent from thegreathead@gmail.com
22 to thegreathead@gmail.com?

23 A Yes.

24 Q Whose e-mail address was that?

25 A That's my personal name address. That was my personal

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1 e-mail address at that time.

2 Q How did you come up with the great head?

3 A It's not sexual. That's not what it was meant to be.

4 I opened that e-mail account -- no, because he had
5 later used to joke that it was sexual and I didn't even know
6 that concept.

7 I opened that e-mail account in my first year of
8 high school. So, as you know, I went to the IB so all my
9 friends were like very geeky, and we were all very geeky, and
10 I was known amongst my circle of friends to like have really
11 good ideas. Like, when we had to write papers, they would
12 like ask me, Daniela, what should I write my paper about?
13 That, coupled with the actual size of my head, which some
14 people think is unusually large, just in circumference, my
15 classmates used to joke and call me the great head, and like
16 the great head in, Spanish, so I just translated it.

17 They used to call me La Grand Cabeza, as a joke like
18 just to mock me. Just an inside joke. So I translated and I
19 had used thegreathead@gmail.com.

20 Q So that's your e-mail address, why are you sending it
21 from you to you?

22 A That's -- to date, that's how I send notes to myself.

23 Q And that was dated July 6th, 2005; is that right?

24 A Yeah.

25 Q Do you remember anything about the sequitor site, or

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1 suffering site?

2 A No. There's quite vague, I don't know exactly what the
3 content discussed would have been. I know sequitor was like a
4 term that was used in ESP, but I don't remember specifically.

5 Q As you started having more access to Flintlock, in the
6 early part of that time, were you still on a tourist visa?

7 A Yes.

8 Q And you've explained already that you would come in and
9 out of the country; is that right?

10 A Yes.

11 Q Did your sister Marianna have to do the same thing?

12 A Yes.

13 Q Do you know whether she would?

14 A Whether she would?

15 Q Yes.

16 A Yes. At least while I was around she did.

17 Q And how would you typically go in and out of the country?

18 A Typically, I -- I flew back and forth, although there was
19 one instance where I -- it was after I had been fired and I
20 was, you know, struggling with money. I -- I mean, I had been
21 struggling with money and I had to travel by bus. So I had to
22 travel by bus from Albany to Mexico.

23 Q Around that same time, was your sister also traveling to
24 Mexico?

25 A Yes.

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2407

1 Q How did your sister travel to Mexico?

2 A She traveled via private plane.

3 Q Whose private plane was it?

4 A I understood it was Clare Bronfman's.

5 Q Did you ever talk about that discrepancy with the
6 defendant?

7 A Yes. That in particular, but there were other -- that
8 was a salient discrepancy but there were -- there were
9 distinct differences in his treatment of my sister versus his
10 treatment of me that I thought were definitely unfair, but
11 also completely inconsistent with the integrity and cause and
12 effect that ESP was teaching and that he was supposed to stand
13 for.

14 So I knew I was struggling with money and I didn't
15 have the money to make it and all these things. My sister had
16 never worked. She didn't even have her own money. Actually,
17 you know, everything was given to her and she was traveling in
18 private plane and I thought, I am -- he gives me such a hard
19 time because, you know, through the community and he himself.
20 And it wasn't so much -- I love -- I love my sister. I --
21 I -- I -- I -- I love my sister. It wasn't about why does she
22 have all these things. It was why is there such a difference?
23 Like what's wrong with me? Why am I being punished this way?

24 And he did explain it. He gave me a reason.

25 Q And what was that?

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2408

1 A He said he was much harder on me because I was special.
2 I had a lot more potential.

3 Q Looking back, do you believe that was the reason?

4 A I don't believe that was the reason. I -- I don't -- I
5 don't know a lot of the reasons why.

6 Q Did there come a time when you had difficulty renewing
7 your visa?

8 A Yes.

9 Q What happened?

10 A My visa was withdrawn. So I traveled from -- so from
11 2002 to 2004, I was traveling on a tourist visa and -- and --
12 and going back and in that's what I was doing.

13 From 2004, late 2004, it was time for me to renew.
14 So I flew back to Mexico and I flew back into the
15 United States on that tourist visa on my birthday in 2004. So
16 it was October 26th, 2004. And I was with my father. We were
17 traveling together and we flew via Atlanta, and we were in
18 Atlanta, and we got stopped. And they withdrew our visas.

19 And so we were held -- we were -- there was no
20 penalty. It was just, you know, we couldn't -- we couldn't do
21 that and we had to wait a year to apply again for a visa. And
22 sent back to Mexico.

23 Q I'm sorry. Did you give the date?

24 A Yes. October 26th, 2004.

25 Q And so what happened after that?

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2409

1 A Whoo, I was crushed, you know. I no longer had any life
2 in Mexico. I wasn't going to school. I still had the
3 expectation that Keith was going to teach me. So all my eggs
4 were in that basket. I had no eggs in Mexico; none
5 whatsoever.

6 So I was beside myself. I was -- a year, you know,
7 like it was a long time. So I was very sad. I was -- yeah, I
8 was -- I was very sad.

9 Q Did you speak to the defendant while you were in Mexico?

10 A Yes, we were speaking constantly by phone. We had a very
11 close relationship by then. So we were talking on the phone
12 and, you know, I was sharing with him all of the stress in
13 my -- I was very upset. I was very upset that I couldn't go
14 back and I was going to have to wait a year, at least.

15 Q And so what did the defendant say?

16 A The defendant, Keith Raniere, said -- he came up with a
17 plan. He came up with a plan to bring me back. It was an
18 exciting time for me. I mean, that Keith wanted me back so
19 bad that he was plotting this -- this strategy.

20 He was the one like -- he was -- he was figuring out
21 maybe you can come through Canada and then, you know, do this
22 and that. And he told me that he was -- he told me he was
23 coming up -- like he was going to have someone have an ID for
24 me, so his plan was this. He had like a master plan for
25 bringing me back.

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2410

1 Q And so was he telling you this plan while you're in
2 Mexico?

3 A Yes.

4 Q And he's communicating all of the details?

5 A Yes.

6 Q Did you -- do you have any other conversations that you
7 remember with anyone else while you were in Mexico about this
8 plan?

9 A Not that I remember.

10 Q So what happened? What does the defendant actually tell
11 you the plan is?

12 A He tells me the plan is that I will fly to Canada. At
13 the time, a Mexican did not need a visa to fly and stay in
14 Canada. So that wasn't going to be an issue.

15 So I would fly to Canada and in Canada, he would
16 send someone to meet me. That someone, in this case, was
17 going to be Kristin. So -- and Kristin would bring with her a
18 fake ID for me and I would be crossing the border on the
19 U.S. -- to the U.S. as an American.

20 So it was going to be like with a fake ID. It is
21 wasn't a fake visa. It was a fake ID. And the plan was that
22 this was to happen on Christmas Eve, so like the holiday rush
23 would -- kind of things would be busy, so maybe there were
24 more like -- it was like the likelihood of it succeeding would
25 be higher. And that was the plan.

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2411

1 Q Did he provide any additional details about who else was
2 involved?

3 A There was one additional detail. There was -- I -- I --
4 yes. I knew that the fake ID was being worked on by Kristin
5 and Siobhan. Those were the two people involved that I knew
6 about.

7 Q So what happened?

8 A So -- so I flew to Canada, a day or two before Christmas
9 Eve, and my father gave me some money and the plan was to buy
10 some stuff, because the story line was going to be that if we
11 were stopped on the way to the U.S. and they asked us why did
12 you come, what was your reason for your visit? We would say
13 oh, we came shopping.

14 So I went to the Eaton Centre and bought some gifts.
15 And the plan changed. Kristin did not show up. The person
16 who showed up was Kathy Russell.

17 So I met with Kathy Russell and she gave me my fake
18 ID, which was -- it was terrible. This fake ID looked so
19 homemade. I was -- I remember because I was very frightened.
20 So I thought Keith had devised all this plan and, you know, I
21 was putting my trust on him, on this plan.

22 And when I saw that ID, I was just so afraid because
23 it looked like amateur hour. It was -- it was -- it was like
24 a they call sheriff's ID. It had my picture but it didn't
25 have my information. The name that was there, I do remember.

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1 The rest of the information I don't remember. It was Lisa
2 Chinoa -- and, yeah.

3 So she gave me my ID. Well, the ID that I was going
4 to use for crossing.

5 Q Did you say anything to Kathy about the fact that the --
6 she wasn't who you were expecting to see?

7 A Yes. Yes. Yes, I mean, it was -- I was expecting
8 Kristin. And so, apparently, Kristin had chickened out. And
9 I used the wrong phrase when I said that before. I said
10 chickened off, I remember that. She had chickened out. So it
11 was Kathy who did the entire thing with me.

12 Q What did you know about -- who was Kathy Russell?

13 A Kathy Russell was a woman who had moved from Alaska to
14 help the mission, as I understand. And she was an accountant
15 and she worked in the admin office with Karen.

16 Q How old was she?

17 A I think she was older than Keith. So she was old.

18 Q Did Kathy do any shopping with you?

19 A Yeah, I think so. I think, yeah. Yeah, we -- I mean, we
20 didn't like meet and go right away. We actually spent some
21 time at the mall together. I think she, if I remember
22 correctly, she bought like a set of velour pants.

23 Q And so what happened next?

24 A So we got in the car, put our small bags with the
25 shopping in the back, and we headed towards the border.

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1 And -- oh, I was incredibly nervous and -- and it -- everybody
2 who goes through the border is going to get stopped and asked
3 some questions. That, I knew.

4 So the agent, the Immigration agent, sure enough,
5 stopped us. There were almost no cars. I remember there were
6 a few lanes, but there were almost no cars, and he asked for
7 our IDs. So Kathy handed him -- he was on Kathy's window
8 side. She handed him her ID and I handed it to her. She
9 handed it to him. So he had our IDs.

10 He was asking some questions like where you from?
11 You know, why did you come here? Some shopping. And he asked
12 Kathy some questions and then he asked me, you know. And I
13 remember he was like staring at this really badly made
14 sheriff's ID card and -- anyway, I was starting to panic
15 because he was just like staring at it, like looking at it,
16 like inspecting it.

17 So I remember I leaned in and I asked -- I asked the
18 agent how's -- how's the weather ahead? I don't know, to try
19 to defuse the situation and he got a little bit distracted.
20 And he said it was clear and we should hurry up if we wanted
21 to make it for, you know, dinner for the holiday.

22 And we thanked him and he handed us our IDs and we
23 left.

24 Q And so then what happened?

25 A So then I almost threw up. It was -- it was -- it was

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1 nerve wracking. It was frightening. It was a frightening
2 experience. And we drove straight to Albany. We drove
3 straight home.

4 Q And did you meet anybody else on the way?

5 A Not that I remember.

6 Q On the other side of the border?

7 A On the other side of the border?

8 Q Was it just you and Kathy?

9 A Yes.

10 Q And then what happened when you got to the -- got back?

11 A When I got back there was -- I don't remember exactly.
12 There must have been a Christmas get-together because it was
13 Christmas Eve. I remember I was happy to be back. I don't
14 remember who was there.

15 I remember my sister and I remember that Pam was
16 away for the holiday, so it was a bit of like an empty
17 gathering. But you know, it was -- it was -- it was -- it
18 was -- it was good to be back and it was like a -- it was all
19 that was talked about. It was like the triumphant story of
20 having successfully crossed the border and I was back in the
21 U.S.

22 Q Who was there for the conver- -- was the defendant
23 present, present for the conversation?

24 A Yes.

25 Q Was he participating in --

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1 A Yes.

2 Q -- this?

3 What was he saying?

4 A Well, he was partaking in the fun, you know. It was my
5 experience normally with this, this specific situation, but
6 with other situations that -- that when something like this,
7 of this nature, that is not, you know, a good thing to do, but
8 that it was done for like, and pulled off by the group, like,
9 that there was a certain, like, fun and enjoyment in -- in --
10 in discussing like the exploits. It was like a -- that was
11 just how I -- how it felt.

12 Q Why do you think Keith didn't just come get you?

13 A That's not how he works. No. Keith -- Keith would never
14 put his name or his person at risk in any way. That's --
15 that's just not how he operates.

16 Q Did you ever observe that later?

17 A Yes.

18 Q Would other people -- who else would operate on his
19 behalf?

20 A Well, I did. Kristin Keeffe would. Let's see. Kathy
21 did. Karen. Everybody would operate on his behalf.

22 He gave the instructions. He plotted. He gave the
23 instructions, but he would never be one doing it. He would
24 never be the one with his hiney on the line.

25 Q When you entered the country, did you know that that was

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1 illegal?

2 A Yes.

3 Q And why did you do it?

4 A I -- I really wanted to make it back. I didn't want to
5 wait a year and I wanted to make it back.

6 Q After that night, would anyone ever bring up the fact
7 that you had been brought over the border?

8 A Yes.

9 Q How would it come up?

10 A Well, it came up in two different ways. It came up in
11 the way that it was discussed when I had freshly made it into
12 the country, which would be in like a playful kind of
13 recounting and adventure-type of way.

14 But the way it really came up all the time, and it
15 would increasingly get worse and worse, was some kind of --
16 well, they had something on me. Like, you know, they had
17 brought me into the country illegally, and that was a sort of
18 investment they had made for me, like a favor they had done
19 for me. I am a liability for them.

20 So oftentimes when I was doing -- actually not
21 off -- every time I was doing something that was not what they
22 wanted, I was failing at something, I was -- then it would be,
23 well, we brought you here. So, you know, you can't just do
24 this. You can't just do that.

25 Q Going back to the actual night when you came back, what

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1 happened later that night?

2 A So later that night, at some point it was just Keith, my
3 sister, Marianna and myself. Pam was not home.

4 So we were hanging out in the downstairs of
5 Flintlock for a while and then he wanted to see me, wanted to
6 take a nap with both of us, which was very strange. Like, I'd
7 never napped with Keith, just the two of us. I never slept
8 with Keith, napped with Keith. It's not something I did.

9 So -- I don't know, it was my sister, but I felt
10 like invited into something special. I went upstairs. He
11 brought us upstairs and we laid down, and I quickly found out
12 it was not napping. All of a sudden -- and I -- it was
13 sexual, you know. And I -- and it was my sister.

14 And I remember -- I remember parts of it. It was
15 just like all of a sudden, you know, he's kissing her and like
16 he's touching me and I start crying. She starts crying and
17 like -- not like -- like crying like, what is going on? This
18 is messed-up crying. And he -- we stopped.

19 I mean, I -- he stops. And Marianna is out of
20 control. I'm also like crying like -- like -- like horrified.
21 I felt -- it felt dirty. It was -- it was bad. It was wrong.

22 And he got up. My sister got up with him and he
23 took her and they went to Hale. 8 Hale Drive.

24 And -- and I stayed there. I just crying. And that
25 was Christmas.

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1 Q Did you ever discuss that incident with the defendant?

2 A We never spoke about it again. I didn't speak about it
3 with him. I didn't speak about it with my sister. I just
4 pretended it never happened and he did exactly the same.

5 Q Do you remember what level of undress the defendant was
6 in during that incident?

7 A Yeah. I -- I -- I remember -- he had his pants down. I
8 don't remember my clothes coming off or my sister's.

9 Q At some point did the defendant have you participate in
10 any other sex -- any sex acts with other women?

11 A Yes.

12 Q Can you describe that.

13 A Yes. So it was on two separate occasions. And it was
14 with the same person and this person was Kathy Russell. And
15 this happened after I had crossed in with Kathy. It was one
16 instance where I was in Flintlock and Keith was there and
17 Kathy stopped by to visit.

18 And she was there talking to Keith and I know they
19 started touching each other, and I was just like trying not to
20 look, but it became really, really -- like, really sexual,
21 like hot and heavy sexual, like it was hard to ignore. And so
22 they got up and they are going to go to her apartment and, you
23 know, Keith asked me to come with them.

24 Q During that interaction, did the fact of the border
25 crossing come up at all?

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1 A Yes. With -- with -- with Kathy. She wasn't involved in
2 many of the projects, I felt, so the few projects that she was
3 involved with, like, it used to be emphasized like it was a
4 point of focus. So every time she was around, it was, like
5 oh, and thanks to Kathy, Kitty -- Kitty is what she used to
6 call me, used to call when she was around -- Kitty is here.

7 And we all thank you so much. If it wasn't for you,
8 I wouldn't be here. And she would maybe recount what
9 happened. So -- and in that particular location, yes, it had
10 been mentioned.

11 Q How did you feel about the fact that that was being
12 brought up at the same time that you're being asked to engage
13 with them sexually?

14 A It was by no means an explicit connection or a directive
15 that I was given, but I felt like because she had brought me
16 over, there should be like this bond between us. And I felt
17 like I should feel grateful and I felt like I should feel, you
18 know. So I felt like I owed them.

19 Q Did you end up participating in a sex act with them?

20 A Yes.

21 Q And there was another incident as well?

22 A Participating is maybe -- so I was there, but I wasn't
23 really participating. So in this was the first incident, we
24 went to Kathy's apartment and I -- I was completely undressed
25 and they were both completely undressed, and there was sex and

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1 there was like encouraging to have me to like do things to
2 Kathy, but I didn't want to. And I didn't. I just didn't. I
3 just didn't want to. And so I didn't. And so I just stood
4 there.

5 And I was laying there with them, but I wasn't -- I
6 wasn't really participating. I was just there.

7 I did end up doing what I did all the time, which
8 was I -- I did oral sex on Keith, but I -- while he was doing
9 something else to her. Paying all attention to that. And it
10 just -- but -- but -- I was part of it, just...

11 Q Do you think you were conveying that you wanted to be
12 participating in that?

13 A Well, I wasn't moving. I wasn't moving and I wasn't -- I
14 didn't say anything. I didn't say anything. But I think it
15 was pretty evident that I was extremely uncomfortable, is an
16 understatement.

17 Q And then the next incident?

18 A The next incident was in the house of a woman named
19 Barbara Bouchey. She had a condo next -- not next to, but
20 very close to Flintlock. And he had been having some kind of
21 health issue. Like he had like a problem with his back. And
22 he threw off his back, something like that.

23 And he had been staying at her house for like a
24 period of days, maybe weeks, like days. So Flintlock was no
25 longer like a place where people would go visit, because he

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1 wasn't there. So he was in Barbara's house so people would go
2 there.

3 And I went there to visit and when I was there,
4 Kathy also visited and that's when it happened.

5 Q So let me just ask a question.

6 Why, because he's sick or hurt, is there a shift to
7 Barbara Bouchey's house?

8 A I'm -- I'm not sure why that happened. It wasn't usual.
9 I remember thinking that he was there because she liked the
10 idea of taking care of him. There was something going on.

11 I mean, when Keith was sick, Keith was unified. So
12 he's not like a person who got sick just because he got sick.
13 It's like this belief that people were unified didn't have
14 this situation. It wasn't even in their bodies, so they
15 wouldn't get sick. He was sick because someone was doing
16 something bad.

17 So someone was going off. Some woman was doing
18 something, so he was having a very hard time and he was
19 hurting. That's what was going on.

20 And I don't remember exactly why it was in Barbara's
21 house, but that's where they were taking care of him.

22

23 (Continued on following page.)

24

25

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1 bY MS. PENZA: (Continuing.)

2 Q And so he was sick but then asked you to participate in
3 something?

4 A So he was -- so, he was sick and Kathy and I were both
5 there and he asked us if we wanted to make him feel better.
6 So that was at that time we both did oral sex on him.

7 Q Did the defendant ever take naked pictures of you?

8 A Yes.

9 Q Do you remember when that was?

10 A I remember the period of time. I think it was around --
11 after I crossed, before the fight -- it would have been, like,
12 around 2005, somewhere around 2005.

13 Q What do you remember about that?

14 A I remember he got a camera. I remember he was looking
15 for a camera and he got a camera that Loretta was supposed to
16 know a lot about cameras.

17 Q Who was Loretta?

18 A She's somebody I lived with for a period of time when I
19 first moved to Albany and she was Nancy's personal assistant
20 who later -- and she had other roles and rents but I don't
21 know what they were at the time.

22 Q Okay.

23 A She lived there and she was the one that knew about
24 cameras. She's the one that suggested this -- I think it was,
25 like, a Cannon camera. It was a big one. Not a small one.

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1 It was a big, professional camera.

2 And I remember noticing that he had gotten a camera
3 and me asking why did he get a camera and no answer. I
4 remember him running around with a camera. He would go --
5 Flintlock has a control center. And he would go to a meeting.
6 And he was running around with this camera. And I remember
7 the time very well. And one day we were at Flintlock and he
8 took the camera out and he asked me to take my pants down to
9 take a picture of me and I didn't want to. I didn't want to.
10 I didn't want to have a picture taken of me, much less naked.

11 So, he insisted, but I didn't want to. But he
12 insisted so I ended up pulling my pants down and he took a
13 picture of me.

14 Q Do you remember all of the pictures?

15 A No. I -- no. I remember we were by the couch and he
16 asked me to remove my pants and my panties and he was -- you
17 know, covered -- I remember covering myself with my hands and
18 I remember him telling me to move them and telling me to
19 spread my legs and I remember wanting it to stop. I remember
20 asking what do you want my picture for. And I don't remember
21 what else.

22 Q Did the defendant position you in any way?

23 A Yeah. He was giving me specific instructions of what you
24 know, I imagine, like he -- he was trying to tell me how -- to
25 tell me how to position myself.

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1 Q And were any of those pictures closeup pictures?

2 A It was very close. I don't know how much one can zoom in
3 with a camera, so I don't know if he zoomed in even further
4 than he was from me.

5 MS. PENZA: Your Honor, shall I move to a new topic.

6 THE COURT: Please.

7 BY MS. PENZA:

8 Q Now, you mentioned earlier Daniela that you would -- you
9 began documenting the defendant?

10 A Yes.

11 Q Were there any other new roles that you took on after you
12 began having sex with the defendant?

13 A Yes. I mean since I was spending more time in Flintlock
14 and with him and with Karen there, at some point I started
15 also helping them clean the house. So, like, there was --
16 Flintlock was, like, very messy, like very disorganized. It
17 was, like, a pig sty. There were jokes about -- it wasn't a
18 joke. It was a story that one time Pam hired, like, a maid
19 service, like a cleaning service, to come clean the house and
20 they actually left a note and refused to clean the house
21 because it was so disorganized.

22 So little by little I was starting to -- like, I
23 remember there was, like, books and stacks of books all over.
24 There was a treadmill and a piano and papers and things. So I
25 started organizing things and quickly after that I decided I

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1 was going to just catalog them all because there was so much
2 stuff. So I started a catalog of all of the books, all of the
3 music, all of the videos so that, you know, it could be
4 organized and found.

5 Q Were you paid for any of that work?

6 A No.

7 MS. PENZA: Your Honor, I move Government Exhibit
8 1503 and 1505 into evidence.

9 THE COURT: 1503 and 1505?

10 MS. PENZA: 1503 and 1505.

11 MR. AGNIFILO: No objection.

12 THE COURT: Government Exhibit 1503 and 1505
13 received in evidence.

14 (Government Exhibits 1503 and 1505 received in
15 evidence.)

16 MS. PENZA: Thank you.

17 (Exhibit published.)

18 BY MS. PENZA:

19 Q Daniela, can you read the From and To lines here?

20 A Yes. So that's from danielathegreathead@gmail.com to
21 kunterre@nyc.rr.com.

22 Q Whose e-mail is that?

23 A That's Keith's e-mail address.

24 Q Is there a subject line?

25 A Yes, Executive Library Catalog.

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1 Q What's the executive library?

2 A Executive library was -- all right, so somewhere around
3 that time there was a property that was purchased that was in
4 8 Hale Drive and -- or I don't know that for a fact, maybe it
5 was purchased before. But it was at that time that that was
6 beginning to be rebuilt. If I remember correctly it was a
7 gift from Nancy to Keith. At least that's how they mentioned
8 it. That was supposed to be a base for Keith to have his
9 things, to have nice things that he wanted. So, the executive
10 library was -- ended up being the repository of all of Keith's
11 books and music and videos.

12 Q What else was in the executive -- do you remember when
13 the executive library was being designed?

14 A Yes.

15 Q Who participated in that?

16 A Kathy Russell. Kathy Russell was -- I thought she was
17 the only one involved, like, the lead in it. There was a
18 period of time there where she would visit every night and
19 come and report to him what the progress was, what the
20 contractor still needed to do. The hot tub, where it needed
21 to go. The windows, where they would go, the shelves, the
22 lighting, the fixtures. So she was working on that and was
23 reporting to him or they were working on it together.
24 Something like that.

25 Q Do you remember when it was first brought up that there

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1 would be a hot tub in the library?

2 A No, not the first time that it was brought up. I
3 remember it being mentioned many, many times but I don't
4 remember the first time.

5 Q Was there anything else mentioned that would be in the
6 library?

7 A Yes, there would be a steam room and the hot tub and the
8 piano. There was a big Steinway, I think it was a Class D,
9 like, big piano in this small condo. It was big. It occupied
10 almost the whole downstairs. It was like the kitchen. And
11 that was it.

12 Q What was the bed like?

13 A The bed was, like, in a loft. It wasn't really that
14 messy because it was so close to the ceiling there was a space
15 to lay down. But you couldn't stand up in the loft. It was
16 just to lay down. There were small wooden steps and just the
17 bed and on the ceiling there was a TV so you could lay down
18 watching TV.

19 Q Who would typically use the library?

20 A Keith and later when it was ready and it was used a
21 little more, I knew that Pam, Mariana and Keith spent, like,
22 entire weekends there, like cooking, watching TV and movies,
23 and resting.

24 (Exhibit published.)

25 Q Moving back to Government Exhibit 1503. I'll move around

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1 a little bit. The Excel is printed a little funky, but is
2 this document familiar to you?

3 A Yes.

4 Q And so could you explain what this is?

5 A So, that is -- so, that's a type-up of all the
6 information by which a book was identified. So title,
7 authors. I think it's cropped here, but probably on the other
8 side there's ISBN number so that it could be referenced
9 correctly.

10 Q And who came up with the -- who came up with this Excel
11 spreadsheet?

12 A I did.

13 Q And did you come up with an organization plan for the
14 defendant's books?

15 A Yes, later. After this I did.

16 Q And can you explain what that was?

17 A The organization plan was so -- the library was
18 relatively small and -- but it was growing daily. So he
19 would -- he would be ordering books on Amazon every day. On a
20 daily basis there were new books in the front of the house.
21 So the challenge there was to have a categorization system by
22 which it could grow both in topics and in space. Like -- I
23 will try to give you an example.

24 So there were, like, three big shelves and let's say
25 that one shelf was occupying mathematics and so if we

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1 organized it in a traditional way and we assigned that space
2 and you put it in the system, then maybe he would order ten
3 more books in mathematics and it would no longer fit. So
4 there was a lot of work to do there.

5 So the best idea was to organize them as they came
6 in and put a unique identifier of where they were located and
7 organize them by categories in the computer. So you can find
8 a book in the computer and log an ID and go and locate it.

9 Q Now, that catalog that we just looked at, was that just
10 one iteration of this?

11 A Yes. So when it was an Excel spreadsheet, as he received
12 more books, I would enter them. I would update it with a date
13 and I would send it to him. I would send it because he
14 wanted -- he had to refer to which books I had. So every time
15 there were more books and I updated the spreadsheet, I
16 would -- I would re-save and resend it.

17 (Exhibit published.)

18 Q And, so, putting Government Exhibit 1503 back, the date
19 on here is March 23, 2005; is that right?

20 A Yes.

21 Q Showing you what's in evidence as Government Exhibit
22 1505, is this another example of the same type of catalog?

23 A Yes.

24 Q And this one is dated July 2, 2005?

25 A Yes.

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1 Q And were there many more of these?

2 A Yes.

3 Q At some point were you tasked with something called a
4 book report?

5 A Yes.

6 Q Can you explain in the context in which you were writing
7 them what a book report was?

8 A Right. So, in Mexico we don't have the concept of book
9 reports, but in the U.S. I understand you do. So that's not
10 what they were like. They were not book reports like the ones
11 written in school regularly. Those are usually, like, small
12 summaries of writings of maybe even, like, a science fiction
13 or novel. These book reports were very specifically supposed
14 to be precise, all encompassing summaries of text, so that
15 Keith could read it without having to waste the time or use
16 the time, rather, reading an entire book because his time was
17 very valuable. So, the point was the summary of the book had
18 to contain all of the information, just in a compact form.

19 Q Were you supposed to be being paid for book reports?

20 A Yes.

21 Q Did you ever get paid for a book report?

22 A No.

23 Q Why not?

24 A Because I was not finishing them on time.

25 Q And did these take a long time for you to write?

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1 A Yeah, they took a long time for me to write, yes.

2 Q These were dense -- why don't you describe the types --
3 the types of books that you're summarizing.

4 A So, Keith chose the books that I was to make book reports
5 on and a lot of the text that he chose were -- they ranged in
6 I would say level of depth. So there were certain books were
7 almost fiction books and some were literally textbooks. So
8 they were dense in the amount of information contained as well
9 as the level of specifics. So, like, heavy in math, heavy in,
10 like, in the actual explanation of the formulas and how they
11 derived all the concepts.

12 And the other side of the spectrum in the range
13 there were also books that were more like general science
14 books, maybe something you could find at a Barnes & Noble,
15 like, that usually tends to be an author that summarizes and
16 writes examples of scientific concepts but in layman's terms.

17

18 (Continued on the following page.)

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1 BY MS. PENZA (Continuing):

2 Q The ones that are not for the general population, the
3 ones that are denser, were you always able to just read that
4 book front to back and digest it?

5 A No.

6 Q Can you explain?

7 A Yes. So, I mean, I didn't have an education, so some of
8 these books had concepts -- in the topic chosen, there were a
9 lot of concepts that were covered, so sometimes concepts in
10 biology, concepts in physics, concepts in math, that were used
11 as part of the explanations within the book for certain
12 concepts that I wasn't familiar with.

13 So, what I would have to do is go and study that and
14 learn that so that I could understand and summarize.

15 Q Was it conveyed to you that these were important to
16 Keith, to the Defendant?

17 A Yes, both by Keith and by other people.

18 Q How so?

19 How would that be described?

20 A Well, it was described as, you know, I guess twofold:
21 That Keith's time was very valuable, so it was important that
22 he be able to have those so he wouldn't have to spend the time
23 actually reading that stuff; but it was also important that he
24 had them and he had them fast because he needed to further the
25 mission, so these -- obtaining this type of knowledge was

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1 needed so that he could further his -- what he was doing,
2 whatever -- the mission, I would say.

3 Q Was one of the topics that you were asked to do book
4 reports on systems thinking?

5 A Systems theory, yes.

6 Q Can you explain generally what that is?

7 A Yes. So, systems theory is kind of a bridge science, I
8 would say. So, systems theory is the study of systems
9 themselves, so nothing specific. Not like the human body as a
10 system, not the economics of a country as a system, not a cell
11 as a system, not a computer as a system, just systems in
12 general, characteristics and properties of systems. And in
13 that way, systems thinking is automatically multidisciplinary
14 because it can study all fields.

15 So, in studying systems, one focuses on the
16 concepts. So, for example, you take a system and you notice
17 that it is able to keep homeostasis, it regulates itself; you
18 notice that it processes certain feedback loops so that it can
19 regulate itself. Because even though there are systems that
20 are very complex, one still notices that they have some
21 cohesiveness and some organization. So, all of these
22 characteristics are things that in systems theory are studied
23 and categorized. They call them isomorphisms.

24 So, you have all these characteristics. And you can
25 take a human body and say, This is the system and study in

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1 this way with this framework.

2 Or, This is a business. It also has feedback loops
3 and control strategies and it can keep homeostasis in certain
4 ways.

5 So, it can apply to anything that is a complex
6 system, and it helps cross in between areas of specialized
7 science.

8 I hope I did that well.

9 Q Where did you learn what you just described to us?

10 A I read it.

11 THE COURT: Who gave you these assignments,
12 specifically gave you these assignments?

13 THE WITNESS: Keith.

14 THE COURT: Keith directly?

15 THE WITNESS: The actual books to read? Yes, Keith.

16 THE COURT: And who gave you the deadlines to write
17 the reports?

18 THE WITNESS: Those were given to me by different
19 people, like Karen.

20 THE COURT: And did you ever look at an assignment
21 and say, This is something beyond the scope of my knowledge or
22 my ability to provide the report.

23 THE WITNESS: Yeah, there were times I said, This is
24 going to take me a lot longer. This is difficult.

25 THE COURT: And what was the response.

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1 THE WITNESS: No, I was expected to do them faster?

2 THE COURT: Do them faster?

3 THE WITNESS: Do them faster than what I said I
4 could do, yes.

5 THE COURT: All right. Let's take our afternoon
6 break. All rise for the jury.

7 (Jury exits.)

8 THE COURT: The witness may stand down. Please do
9 not discuss your testimony with anyone.

10 Ms. Penza, will you go to the end of the day on
11 direct?

12 MS. PENZA: Absolutely, your Honor. I expect to go
13 through at least lunch on Tuesday and probably a little
14 longer.

15 THE COURT: All right. We'll take a ten-minute
16 break. Thank you.

17 (Recess taken.)

18 THE COURT: Let's bring in the witness, please.

19 (Witness resumes the stand.)

20 THE COURT: Let's bring in the jury.

21 (Jury enters.)

22 THE COURT: Please be seated.

23 Ms. Penza, you can continue your examination of the
24 witness.

25 The witness is reminded she is still under oath.

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1 BY MS. PENZA:

2 Q Daniela, did you have money -- when you came back to the
3 United States when you crossed over illegally, did you have
4 any money troubles?

5 A Yes, yes. I didn't have a way to make money. The book
6 reports wasn't something that got paid for and, you know, I
7 was illegal so there wasn't any other kind of job that I could
8 take, not even on a tourist visa. And there were not very
9 many avenues for me to make money in the position that I was
10 in.

11 Q So, what did you do for money?

12 A A few odd, very odd, things.

13 So, at some point my mom was helping me, and she
14 would get me jobs. She would say she offered cleaning
15 services, cleaning people's houses like a maid, and she would
16 let me go and clean the house and give me the money that she
17 would be paid for that. And this is for people in ESP. So I
18 clean, like Emiliano Salinas' house, Edgar's house, Edgar
19 Boone's house. So, just houses of people in the community.

20 And I also -- I started buying and selling things on
21 eBay. So, at that time, one could get like -- it was almost
22 like a debit card, like a credit card but a cash card, and you
23 could register that on Paypal without it being, like, an
24 actual bank account that you have to register your name on.
25 So, I would buy something on eBay and then post it back for

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1 sale for more money and I would be making money that way.

2 Q Did you ever talk to the Defendant about your
3 difficulties with money?

4 A Yes.

5 Q And what would the Defendant say?

6 A That I needed to focus on the book reports, that that
7 was -- already a way for me to make money had been offered,
8 and any time spent not doing that was time that I was waiting
9 from being able to make money.

10 MS. PENZA: Your Honor, the Government moves into
11 evidence Government Exhibits 1504, 1509, 1510, 1511 and 1512,
12 on consent of the Defendant.

13 MR. AGNIFILO: No objection, your Honor.

14 THE COURT: 1504, 1509?

15 MS. PENZA: 1510, 1511 and 1512.

16 THE COURT: Very well. Without objection,
17 Government Exhibits 1504, 1509, 1510, 1511, and 1512 are
18 received in evidence.

19 (Government Exhibits 1504, 1509, 1510, 1511, and
20 1512 so marked.)

21 MS. PENZA: Thank you, your Honor.

22 Q Daniela, I'm showing you what's in evidence as Government
23 Exhibit 1504.

24 (Exhibit published to the jury.)

25 Q Can you read the from and to lines?

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1 A From Daniela, thegreathead@gmail.com, to
2 thegreathead@gmail.com.

3 Q What is the date on this e-mail?

4 A It's June 5, 2005.

5 Q Is the subject line systems outlines?

6 A Yes.

7 Q And the body of the e-mail also said systems outlines?

8 A Yes.

9 Q What was this document?

10 A This e-mail contained attachments of all the systems
11 outlines and the progress that I had made on them.

12 Q So, some of these are in progress?

13 A Yes.

14 Q Can you walk through some of the -- can you explain what
15 the attachments we see here are?

16 A That is, I believe, consistent. All the letters in
17 capitals are the titles, followed by the author of the book.

18 And, so, for example, the first one, the title was
19 General System Theory by Ludwing von Bertalanffy, who was, in
20 fact, the father of systems theory. All of these are like a
21 dozen books by different authors in different areas of study
22 of this field.

23 Q And did you read all of these books?

24 A Yes.

25 Q What was the process of writing book reports on these?

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1 A Well, depending on the level of difficulty -- for
2 example, there were books that were easier. In this list,
3 Emergence by Steven Johnson was very easy, The Art of Systems
4 Thinking by Joseph O'Connor and Ian McDermott were very easy.
5 Those were, like, in laymen terms and you find a whole chapter
6 elaborating on a certain concept. So, they were very easy to
7 read, easy to understand, easy to summarize. So, those would
8 take me -- it was relatively quick. If I sat down and read it
9 and just typed it up, maybe, like, a week and a half, just the
10 time it would take me to do that.

11 There were others that were more complicated. The
12 first one that I mentioned contained a couple of very dense
13 chapters with the math behind some of the processes that he
14 was explaining. The book by David Bohm, for example,
15 Wholeness and the Implicate Order, although not very heavy
16 scientifically was very philosophical. So, it was about
17 thoughts, human thought as a system. So, it was very dense to
18 understand and follow.

19 And sometimes understand, for example, an author
20 might reference a certain theory from the past in science, so
21 I needed to go back and research that, what it was, understand
22 how it was in the context, to be able to really digest and
23 simply, like, really read it and understand the book.

24 Q Is this an example of a page from a book report that you
25 wrote -- a book report in progress that you were writing?

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1 A Yes.

2 Q And where we see these page numbers in brackets, what
3 would that represent?

4 A So, for example, that first paragraph, I'm summarizing
5 the first three to ten pages of the book. So, this little
6 tidbit right here is how I summarized those seven pages in
7 that book.

8 So, every time one sees -- like, the next paragraph
9 again contains, like, a little, like, title, like a brief
10 explanation and the pages that it's covering in the summary.

11 So, the idea was that one could read this and if one
12 wanted to really go directly to the book to expand or there
13 was something that wasn't clear, one could reference it
14 easily.

15 Q So, turning to the second page, and this is the
16 Bertalanffy that you --

17 A Bertalanffy, yes.

18 Q This is another page from you're the book report on
19 Bertalanffy?

20 A That is right.

21 Q And would you have created this whole thing?

22 A Yes.

23 Q And what is the goal?

24 What do you want to achieve from the book report in
25 its presentation?

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1 A In its presentation?

2 Q Yes.

3 A So, I want it to be easy to read, very organized. I want
4 it to be in full fidelity to the actual contents of the book,
5 so I want it to be precise. I want it to be succinct. That's
6 the point of it, that it summarizes, that's it's not just
7 verbatim, typing up everything in the book. It needs to be
8 digested and regurgitated in an understandable way and
9 precise.

10 And it needs to be laid out in a certain way that
11 it's easy to read so that someone can -- like, I could
12 summarize a book that is 250 pages in maybe, like, 11 pages,
13 and people go through that and understand what the book is
14 about really.

15 Q In this paragraph where you describe -- where you're
16 summarizing the problem of immense numbers, what is a Turing
17 machine, if you remember?

18 A I don't. I remember having very much fun with Turing
19 machines, but I don't immediately. I apologize.

20 Q No need to apologize.

21 And all of these books you read yourself?

22 A Yes.

23 Q Would you ever look at other study guides to help you
24 formulate your book reports?

25 A All the time, both to formulate them and, honestly, out

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1 of curiosity.

2 So, in science books, to me one of the funnest parts
3 is the bibliography, so all the words that are referenced. So
4 not only to be able to really understand the content of a book
5 but also to understand the field that it's studying and
6 everything related to it.

7 So, the titles that I summarized were the ones I
8 read that were picked by Keith that I needed to do as work. I
9 did read a lot of other documents, one, as essential to be
10 able to understand. So, without reading either other books or
11 referencing the internet, Wikipedia, understanding certain
12 basic concepts, some not-so-basic concepts, in order to be
13 able to understand what I was reading about, I consulted
14 those. And, also, I read other works just because it's fun.

15 THE COURT: How many of these reports did you do?

16 THE WITNESS: A few dozen, maybe more. Somewhere
17 around that.

18 THE COURT: And when you submitted these reports, to
19 whom did you submit the reports?

20 THE WITNESS: Different people. I submitted them to
21 Keith and then at times I submitted them to Nancy.

22 THE COURT: And was there ever a follow-up where you
23 had a discussion about your report with Keith or Nancy or
24 anybody else in the organization?

25 THE WITNESS: Regarding the content of the book

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1 report?

2 THE COURT: Yes.

3 THE WITNESS: No.

4 THE COURT: You just submitted it and that was it?

5 THE WITNESS: Yes.

6 THE COURT: Do you know whether anything was done
7 with the reports once you submitted them?

8 THE WITNESS: I do not.

9 THE COURT: Were they published in any document or
10 for the membership of the organization?

11 THE WITNESS: I don't know.

12 THE COURT: Had you ever studied any of this in the
13 ninth grade?

14 THE WITNESS: No.

15 THE COURT: Did you ever get any feedback about the
16 contents of the reports from anyone regarding whether the
17 reports were helpful or whether you needed to provide any
18 further information on these books?

19 THE WITNESS: No.

20 THE COURT: Do you know what a Turing machine is?

21 THE WITNESS: I did at some point.

22 THE COURT: It's a computer, one of the original
23 computers, developed by Alan Turing during World War II.

24 I just think everyone ought to know about that
25 because he helped end the war and saved millions of lives.

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1 So, that's my contribution to this discussion.

2 MS. PENZA: Thank you, your Honor.

3 Q Turning to the next -- one of your other reports, is this
4 the one you described, Thought as a System, by David Bohm?

5 A Yes.

6 Q This is the one you said was more philosophical?

7 A Yes.

8 Q Can you explain that?

9 A Yes. In this book, as I recall, David Bohm went into --
10 and I can read some of it there, but it went on to the
11 complexities of how we think of the issues that we have, like,
12 mentally. So, it touched on subjects of philosophy that for
13 ages and ages have been touched before but approached them
14 with the systems concepts. So, it was like thought as a
15 system. So, what are the emergent properties of the mind, how
16 the mind maintains balance, how problems can be solved. I
17 believe it touched on some of the dialectic of Socrates.

18 So, it was very -- it was very dense for me because
19 of the philosophy. It was like philosophy and psychology just
20 because of the nature of what thought is. And it didn't have
21 a conclusion per se, it was just, like, very descriptive in
22 nature.

23 Q The chapter titles, Friday Evening, Monday Morning, do
24 you remember that?

25 A Those were the titles that the author used in the book.

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1 Q And are these just examples of the types of reports you
2 would write?

3 A Yes. And as you can see, they are widely varied.

4 Q What do you mean?

5 A So, the range of topics is wide. Even though they touch
6 on similar things and there's a common denominator in the
7 field of study, there's a difference both in the subjects
8 themselves as well as the style of the writing and the depth
9 of the study.

10 Q Showing you Government Exhibit 510, see this e-mail dated
11 May 1, 2006?

12 (Exhibit published to the jury.)

13 A Yes.

14 Q And it's from you to Nancy Salzman; is that right?

15 A Yes.

16 Q And you're including Bertalanffy incomplete book report;
17 is that right?

18 A Yes.

19 Q Can you read this e-mail?

20 A Yes. It says: Nancy, three sections of this book are
21 beyond me, as specified at the beginning of the report.

22 It says: Note, Sunday April 30, 2006, Daniela. I
23 have omitted the following three sections of the book from
24 this outline until I am qualified to understand them and am
25 able to summarize them with the deservings precision.

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1 Chapter 3, Some systems concepts in elementary
2 mathematical consideration; Chapter 5, The organism considered
3 as physical system; Chapter 7, Some aspects of systems theory
4 in biology.

5 Soon, very soon, I will update this book report.
6 The remaining seven sections are complete. Enjoy, Dani.

7 Q Can you describe the circumstances under which you're
8 submitting this book report to Nancy Salzman?

9 A Yes. So, the circumstances? Well, she was following up
10 on my program because I wasn't completing book reports as
11 requested. So, it changed that I had to check in with them
12 and submit them to her.

13 In this e-mail, I'm clearly telling her that I am
14 submitting incomplete because I have to understand a few
15 things before I can complete it.

16

17 (Continued on the following page.)

18

19

20

21

22

23

24

25

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1 (Continuing)

2 MS. PENZA: Just looking at a couple more examples.
3 Government's Exhibit 1511.

4 (Exhibit published.)

5 Q Is this a book report you're submitting to Nancy Salzman
6 on April 24th, 2006?

7 A Yes.

8 (Exhibit published to jury.)

9 Q And one to Karen Unterreiner and Nancy Salzman?

10 A Yes.

11 Q And that was on December 13th, 2006.

12 A Yes.

13 Q Sorry.

14 So during this time when you had more access to
15 Flintlock, did you also have more insight into the defendant's
16 sex life?

17 A Yes.

18 Q At that point, who did you know the defendant to be
19 having sex with?

20 A Pam Cafritz, Karen Unterreiner, Marianna, Barbara Jeske,
21 Barbara Bouchey, Ivy Nevares, Dawn Morrison, Kristin Keeffe.

22 Q How about Lauren Salzman?

23 A Lauren Salzman, yes. Lauren Salzman.

24 Q How about Kathy Russell?

25 A Kathy Russell.

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1 Q How about Sarah Peters?

2 A Sarah Peters.

3 Q Who was Sarah Peters?

4 A Sarah Peters was a member of ESP in the Albany area.

5 Q What was her background?

6 A She had studied biology, I believe, in SUNY. She had
7 taught me about the clouds. Yeah, she had studied biology and
8 she was doing something else, but she was a student of ESP.
9 And at some point he was having a relationship with her.

10 Q Do you know whether Sarah Peters ever completed book
11 reports for the defendant?

12 A Yes.

13 Q Do you know what she was completing book reports on?

14 A Stem cell research of some kind. Something to do with
15 stem cells.

16 Q Do you know whether she was paid?

17 A I think so, yes.

18 Q Now, did you have any nicknames?

19 A Me? Yeah. From Keith? Like he gave me? Or nicknames
20 in general?

21 Q Well, let's go through both.

22 Were there any nicknames that you were called in
23 general within the NXIVM community?

24 A Within the NXIVM community, Kathy called me Kitty.

25 Q Okay.

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1 A I think at some point Karen, too. And the rest were used
2 by the community, but also given to me by Keith, so.

3 Q Okay. So which ones were given to you by Keith?

4 A He called me Godzilla. He called me Bobo. And I think
5 that's it, as far as the popular one.

6 Q Did Marianna have a nickname from Keith?

7 A Yes. Monkey.

8 Q Did any of the other women have nicknames from Keith? Do
9 you know that?

10 A Yes, yes.

11 Q What ones do you remember?

12 A I remember he used to call Barbara Ja, Ya, something like
13 that. That's how he referred to her.

14 Let's see which other I remember. Everybody had a
15 nickname, they're just not coming to my mind.

16 Q How did the defendant treat the women that he was having
17 sex with?

18 MR. AGNIFILO: I'm going to object to this question.

19 THE COURT: Sustained.

20 Q While you were in Flintlock, did you have an opportunity
21 to observe the way the defendant interacted with the different
22 women with whom he was having sex?

23 A Yes. I had -- because I was around all the time, I
24 didn't see all of the interactions, but I got to see a lot of
25 the -- at least -- so I saw the people who were coming in and

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1 out, and what was happening there. And I also heard all the
2 phone conversations that he was having with them.

3 Q You've described during this time you're basically
4 stationed at Flintlock; is that right?

5 A Yes.

6 Q Now, are there different categories of women in terms of
7 where they live?

8 A Well, definitely in -- yes, definitely in terms of where
9 they live, but also in terms of the access they have to Keith
10 and how they're treated by Keith.

11 Q Can you elaborate on that please.

12 A Yes. So there were people in the inner-inner circle, but
13 it also had a lot to do with who had issues with jealousy. So
14 people who were jealous, even though they might be like part
15 of the inner circle in some way, they were not like approved
16 to be around at any moment.

17 So, for example, I was part of the inner circle and
18 I had full access. He could be with whomever, talking about
19 whatever, I was there.

20 Pam was like that. Lauren was like that. Karen was
21 like that, although she felt like a bit of a more of a serious
22 presence. She -- if talk turned really sexual or something,
23 she would just zone out, I think. She would put her
24 headphones on and keep programming.

25 People who were not like approved to be in

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1 Flintlock, just at any time or had no full access, even though
2 they were close, would be Ivy Nevares, Barbara Bouchey. Like
3 that had to be crafted situations or he'd spend time with them
4 like by themselves. He would visit them in their homes, not
5 the other way around.

6 Barbara Jeske was pretty -- I mean, she wasn't
7 around a lot but she was, you know, she could be around
8 anything, really.

9 Who else? Dawn Morrison seemed to be pretty inner
10 circle, but wasn't around very much.

11 Kathy Russell was part of the inner circle.

12 Pam. Pam was.

13 Q What about Kristin Keeffe?

14 A Kristin Keeffe. Kristin Keeffe was inner-inner circle,
15 but she didn't care for any of the shenanigans going on
16 around. So she had a very low tolerance for that. But she
17 lived there. She lived in Flintlock. But she was certainly
18 like, the core. She had a full access and she was approved.

19 Q When you say shenanigans, what is it you're referring to?

20 A Shenanigans is like -- well, in that specific moment that
21 I said shenanigans, I was -- like there was times when like
22 there was -- like Keith was with someone else, or with a group
23 of people, and there would be like a lot of talk about sex and
24 like -- like, play that way and kind of like, in my opinion,
25 crude way in, you know, like women would react to that.

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1 So some women would tolerate it. Other womens would
2 not.

3 Q Do you have any specific examples of things that you
4 observed that -- examples that you observed?

5 A Yeah. So like, yeah. So like one time like what I
6 described with Kathy Russell and that escalated, and it became
7 that.

8 There was also a time when Lauren came to Flintlock
9 to visit Keith and she sat by his side, like on the couch.
10 And when she went to say good-bye, he grabbed her genitals
11 with his hands, through her pants, and pulled them, and made a
12 joke about her having really large labia. And like a large
13 camel toe, was what he used to love making jokes and pointing
14 out women's genitals and saying things about their camel toes.
15 And about them using or not using underwear. There was a lot
16 of talk about that. And some women were like bragging, they
17 didn't mind. They didn't use underwear.

18 So there was a lot of like very sexual, very, you
19 know, crude things, conversations like that. That's what I'm
20 referring to.

21 Q Did you ever observe the defendant having any problems
22 with any of the women he was having sex with?

23 A Yes. There was almost always someone that he used to say
24 going off. Someone's going off. And it was masqueraded and
25 put as something, like, oh, she's having issues like attention

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1 issues, or she's being prideful, but really, something had
2 happened.

3 Like one time there was an issue because Ivy was
4 driving somewhere in Knox Woods and saw Keith walking with my
5 sister Marianna and they were holding hands and all hell broke
6 loose. She went off.

7 Q Ivy went off?

8 A Ivy went off.

9 And so what that -- then what happened would be he
10 would first cut off contact and be like, okay, you need to fix
11 your issue. You're hurting me. You know, like, what you're
12 doing, going off, is hurting my heart.

13 And he would call one of -- there were a few women
14 who like handled other women. So like he would call Lauren or
15 he would call to tell her, Ivy's going off. You need to work
16 on her. And he would relay all the details of the issue; what
17 had happened. What she needed to address. The realizations
18 she needed to have. So she needs to understand this is why I
19 don't spend time with her. This is why she cannot be allowed
20 in Flintlock. She can't have access because she has all these
21 issues.

22 And many times it was like you didn't see that.
23 That didn't happen. We weren't holding hands. And, you know,
24 it was evident that a woman had seen something that did happen
25 and he would deny, deny, deny.

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1 So there was a huge issue.

2 Q Did you discuss the Ivy incident with the defendant?

3 A Yes.

4 Q And what did he say?

5 A I remember asking like oh, why -- why deny something that
6 she saw? Like if it's true, like, you know, why, like that
7 didn't seem, you know, like, maybe addressing jealousy if
8 that's part of what she wants to do, but why lie about it
9 didn't happen when it did happen? And he explained it to me.
10 He gave me an explanation for it.

11 He said that, okay. So if he validated her fears,
12 because this was all fear-based. If he validated her fears,
13 then he was doing her a disservice because she would never
14 have the opportunity to grow out of this issue. So what he
15 was doing is he was upholding a higher principle, essentially,
16 as opposing the truth, which was I -- she -- I will give her
17 the opportunity to look at this issue in front of her and
18 really, she has an opportunity to fix her disintegrations
19 related to that, and maybe like never again react to it.

20 Q You mentioned Lauren.

21 Would any other women have the role that you
22 describe?

23 A Yeah. Yeah.

24 Q Who else?

25 A Well, it could be like the person's coach. Like, in my

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1 case, like, Karen would be sent when I had an issue, not
2 necessarily of that jealousy nature, but when I had an issue,
3 she was sent to go work on me.

4 Nancy worked on Keith's women. Lauren did. Siobhan
5 did at some point as well, even though she wasn't like, I
6 didn't feel she was like super-inner circle, but she -- she at
7 times, because like it was okay to be sent to work on someone.

8 Pam used to work with all the women, just not in an
9 EM -- kind of tech capacity. She used to be like the defuser
10 of bombs. She used to be like, you know, go in and
11 neutralize.

12 So if Barbara Bouchey was having like a huge issue
13 and she was going off, like Pam needed to go and talk to her
14 to calm her down first so that, you know, to like, you know
15 that he loves you. Like, you know, you can fix it. You know,
16 just a very -- but it wasn't using EMs to -- so it wasn't like
17 full-on ethical breach plan, address this. What is you going
18 to -- like -- it wasn't like that full disciplinary act. It
19 was just like a soft, all right, let's calm things here and
20 then let's work on the rest.

21 Q What time of day or night would the defendant engage in
22 these sorts of crisis management activities?

23 A All day. All hours of the night and day. It could be
24 any time that someone was going off.

25 He had a very odd schedule. He was sleeping during

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1 the middle of the day. Then he would like come by Flintlock,
2 and then was meeting with someone else. So someone could go
3 off at any moment, and these things happened at all hours. It
4 could be midnight. It could be 5:00 a.m. it could be after
5 volley ball; it could be before. Any time.

6 Q You mentioned Ivy.

7 Did you ever hear that she committed an ethical
8 breach?

9 A I heard that she had issues. I don't know that --
10 ethical breach wasn't around like the concept, like early on.

11 Q I see. You heard she had issues?

12 A Yes.

13 Q Was there ever any punishment of Ivy?

14 MR. AGNIFILO: I'm going to object to this, Judge.

15 THE COURT: Sustained.

16 Q Do you know whether Ivy was ever punished?

17 A Yes. Or at least that's how I perceived it.

18 So there was a time when -- when Keith was spending
19 a lot of time with Ivy and I knew because Ivy would not come
20 and sit in Flintlock like other people did. What the
21 nature -- like the logistics, rather, of their relationship is
22 Ivy would come in her car to pick him up and would take him to
23 her house, and they would spend like hours and hours together.

24 And I could see this again, because there was a
25 monitor, you know, in Flintlock. She had a silver Focus car.

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1 So it would pull up in the driveway and Keith would say
2 good-bye, get in the car with Ivy, and she would take him, you
3 know, to her house and -- I thought they were riding together,
4 but I also knew that they had a sexual relationship. So he
5 was spending time with Ivy like hours and hours every day,
6 which is not something he did with many women.

7 So -- and that went on for like a while. And they
8 were -- and she was like writing a lot. I don't know writing.
9 She was writing a lot. She was producing a lot of writing. I
10 know that she was working on rewriting like the module notes
11 and they were working on a lot of articles.

12 And there came a time where he just -- there was a
13 lot of fighting on the phone and there was a lot of arguments
14 and like this is why I can't see you. You need to fix this
15 for me to see you. You're hurting me and on and on and on,
16 and he started like spending less and less time with her. I
17 saw it as a punishment, because not only he stopped spending
18 time with her, but also she became really isolated from the
19 community.

20 Q Do you know whether she was doing anything else in terms
21 of trying to fix this issue?

22 A I don't. She was very isolated.

23 Q Did Ivy have long hair?

24 A Yes.

25 Q Do you know whether Ivy was allowed to cut her hair?

Daniela - direct - Penza

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1 A I know that when Ivy came into ESP, she and I were
2 friends for a little while, so much so that she once cut my
3 hair, and -- because she used to cut her own hair.

4 She had very long hair when she came into ESP. Now
5 she's not like that. I know that he likes long hair. And I
6 know that I wasn't allowed to cut my hair. And I do -- I
7 believe at one point I discussed with Ivy that she -- she
8 couldn't cut her hair.

9 Q You mentioned Siobhan.

10 Do you know what Siobhan's sexual orientation is?

11 A Yes, she is a lesbian.

12 Q Did you ever hear the defendant discuss her sexual
13 orientation?

14 A Yes.

15 Q What would he say?

16 A He would make fun. He poked fun at her often about
17 her -- well, very much in line with, in his style, you know,
18 make some crude jokes, but also in a more serious note like
19 inquire about why, you know, like she didn't like men, or that
20 she really did like men, or that women should like men. Just,
21 you know. And then like, well, this is supposedly playful
22 way.

23 Q Did he claim to have any actual theories regarding women
24 and their sexuality?

25 A He didn't state them as clearly as he stated other

Daniela - direct - Penza

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1 things, but from the things I heard from him, I -- what I
2 understood is that he sort of believed that all women were
3 bisexual. Like we all had like tendencies. Like we're all
4 capable of being bisexual.

5 But that also -- only being lesbian was kind of
6 unnatural, as if there was some kind of disintegration with it
7 like only liking women, that was unnatural. So something had
8 happened much like with other issues with disintegrations that
9 made it so.

10 So that it could be something that could be fixed or
11 like that was the nature of -- for what he said I thought he
12 saw this issue as.

13 Q Did you ever observe the defendant touching Siobhan?

14 A Yes. It was very odd because I knew Siobhan was a
15 lesbian, and he touched her the way he touched his other
16 women. He touched -- like he would put his hand on his back,
17 lift up his shirt maybe, and like linger on their back, or on
18 the small of her back.

19 So it was very -- like I always notice that it was
20 very intimate. Like it's very touchy.

21 Q How did the defendant treat Marianna?

22 A In some ways she had a lot of privileges with him, but in
23 other ways he was also very cruel. I mean, he was cruel with
24 other women, too. I guess I feel a little more closely
25 because it's my sister.

Daniela - direct - Penza

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1 But there were -- so. He spent a lot of time with
2 her. And with Pam. So that time he spent with Marianna is
3 time he spent with Pam.

4 A lot of the time that they spend they spend
5 sleeping. So they would sleep together, the three of them.
6 And they used to share in maybe -- the more time than any of
7 the other women, but a lot of it was like focused on that,
8 like a little like entertainment, I imagine a lot of sex from
9 my sister. I know that there was some sex of that kind.

10 And -- but on the other hand, my sister was also a
11 jealous woman, and she didn't want to share Keith. And she
12 didn't -- she was one of the people that could not be around
13 if, you know, certain people were around.

14 And there were times when she became very jealous
15 and he drove her nuts. Like there was an instance where she
16 came downstairs and it was one of those occasions where I was
17 doing oral sex on Keith, and she got really upset, and he just
18 like denied, denied, denied. So like driving her nuts. Like,
19 what you saw is not what you think you saw. It's not like you
20 think it is. You know, and mom -- my mom -- my sister would
21 have these tantrums that he called them.

22 Like, they were like pride tantrums, but really she
23 was having this huge reaction to something that did happen.
24 And so, you know, like people would come and like EM her and
25 work with her so she would get through all these issues.

Daniela - direct - Penza

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1 I feel like he was maybe a little more lenient with
2 her where he never punished her to the point where like he
3 punished other women. Like, he stopped talking to them for
4 like long periods of time or really isolated them. This was
5 like shorter periods, but it was pretty severe.

6 Q Did there ever come a time when you were concerned about
7 Marianna's health?

8 A Yes. Very early on. Because Marianna -- so it was
9 shortly after I started having sex with Keith. My
10 relationship with him became like very close, like I was part
11 of the inner circle and Marianna is as well, and Marianna was
12 living full-time at Flintlock.

13 But I notice that her eating disorder was back. So
14 she lost a lot of weight. She was extremely skinny and Pam
15 would drive her to Wilton Court once a day, and she would
16 throw up in the shower. Like that's all she would do in
17 Wilton.

18 So she lived in Flintlock. She had all her things
19 there. There was a shower there. There was food there, but
20 she would come to Wilton, stuff her face, throw up, shower and
21 then Pam would come and pick her up. And I was extremely
22 concerned because when I see -- I know she has an eating
23 disorder, I see she's visibly like scary-thin and Pam is
24 obviously aware of it, and he must be aware of it. So I
25 brought it to his attention.

Daniela - direct - Penza

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1 And I told her, you know, my sister has an eating
2 disorder and it's like -- it's like back on like fully right
3 now. Like I was really upset that it was right under his nose
4 and he was doing nothing about it.

5 And his surprise really like his response really
6 surprised me, because he said to me that -- that okay, like,
7 you know, granted it's not good. It's not great. But she is
8 doing everything that she can to meet her goals, you know, by
9 whatever means.

10 So I -- I was like, but there's health consequences.
11 I remember because I said what about the enamel in her teeth?
12 Like that's going to be ruined forever. Like I was thinking,
13 you know, I was concerned about my sister. He seemed not only
14 not to care about what she was doing in order to stay really
15 skinny, but in the same conversation, he made me feel really
16 guilty that I wasn't losing the weight, and that I wasn't
17 willing to do just about anything. Because the fact that she
18 didn't, meant that she really, really cared about him.

19 Q Did you ever observe the defendant commenting on what the
20 women in Flintlock would eat?

21 A Yes. He was -- he was like an absurd focus on what
22 everybody was eating around him.

23 Pam would go into the kitchen and from his couch,
24 which was like his control center, he would like lay on his
25 couch and he has his phone, and that's where he operated from.

Daniela - direct - Penza

2463

1 You had line-of-sight into the kitchen like from both sides.
2 And so he like sees someone go in and like Pam would grab
3 something from the refrigerator, and he would go, like a pig
4 sound, like to get her attention she was eating again.

5 And, you know, she would sometimes like retreat
6 like, you know, like it was something funny or like he was
7 notice who ate this, who ate that. You know, every time
8 someone was eating, there was like some comment about them
9 eating.

10 My sister, of course, had her eating disorder and
11 she -- what she did is she ate a lot of food and she would
12 throw it up. And there was a time where stuff was being eaten
13 out of the refrigerator and he would ask, who ate it? And
14 nobody would 'fess up to who was eating the food.

15 So -- and he knew that the food that was being eaten
16 was my sister. So this one time he actually set up a camera
17 facing the refrigerator and -- to surveil and to catch, to --
18 recording. So it would catch my sister. And he put in, I
19 think it was like, a pie. Like a delicious pie in the
20 refrigerator, and just left the camera there. Sure enough,
21 Marianna went and ate the pie.

22 And he asked her, Monkey, did you eat this pie?

23 And my sister, you know, it happened before, she
24 like felt guilty every time that she ate; everybody did. She
25 said no, I didn't eat the pie.

Daniela - direct - Penza

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1 And asked again, I'm going to ask you one more time,
2 it's really important you tell me the truth. Did you eat the
3 pie?

4 And she didn't admit to it. It was like a big deal.
5 And he showed her the video and there was this big drama.

6 So I think it's fair to say that he was surveilling
7 everybody's food intake.

8

9 (Continued on following page.)

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Daniela - direct - Penza

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1 BY MS. PENZA: (Continuing.)

2 Q I will switch topics. You mentioned earlier that there
3 was a period of time when your younger siblings spent a part
4 of a school year in the Albany area?

5 A Yes.

6 Q And that was with your parents?

7 A Yes.

8 Q I'm showing you what's in evidence as Government Exhibit
9 912. Do you know what that's a picture of?

10 A Yes, that's my baby sister, Camilla.

11 Q Do you know where this picture was taken?

12 A Somewhere in Cohoes, New York.

13 Q And was this when she was going to school in Cohoes?

14 A Yes.

15 Q Do you know how old she was then?

16 A She must have been like 13 or 14, maybe.

17 Q So after your siblings spent that time, did they go back
18 to Mexico for a while?

19 A Yes.

20 Q And while they were in Mexico did the defendant ever
21 encourage you to have your siblings come to the United States?

22 A Yes.

23 Q Can you explain that?

24 A Yes. My siblings with my parents after they finished the
25 year that they were here they went back to Mexico, life as

Daniela - direct - Penza

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1 usual. And Keith started talking to me about it would be good
2 to have both of them back, that, you know, that they really --
3 it would be good that they got their education here and really
4 encouraging me to encourage them to come here and, like
5 Mariana and I, live in the -- in Clifton Park and start -- if
6 I remember correctly, to -- to go to ethos classes and to at a
7 young age develop some Ethos strategies through doing some
8 such work. Basically that they would have the ESP education
9 and the opportunity to develop some ethos strategies at an
10 early age.

11 Q And what is an ethos strategy?

12 A An ethos strategy is a concept from ESP which, if I
13 understand correctly, is that one is not born, you know, with
14 I guess ability, capacity, stamina to exert effort all the
15 time. So it's something that someone needs to build up
16 through doing effort, doing effort, doing effort and striving
17 and that's how one develops the quote/unquote ethos
18 strategies. I don't know if that makes sense. It doesn't
19 make much sense to me now, but that's what it meant.

20 Q Did your siblings end up coming to the United States?

21 A Yeah. I mean, there was a lot of back and forth about
22 that. Obviously I wanted them to go to school. So Keith was
23 brainstorming a lot about what they could do, should do,
24 through me he was encouraging them. I was encouraging them.
25 I was very focused on, okay, so Cami could go to Skidmore

Daniela - direct - Penza

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1 College and Adrian could go to SUNY. And they could get SUNY
2 visas and go to school. So I didn't want my siblings to just
3 come to the Albany area and do nothing. They were very young.

4 So, they did end up going to Albany and the plan was
5 to have them go to Ethos classes. Keith had found different
6 things that they could do that developed even over time, but
7 even right away there was a plan that Keith had devised for
8 what they could be doing and they came here and started
9 spending time here.

10 Q Before this time that you're describing when they came,
11 when they were first in Albany the first time, did the
12 defendant interact with them?

13 A Yes.

14 Q Your younger brother, you call him Hector Adrian. Do
15 some people just call him Adrian?

16 A Yes.

17 Q And did he also have a nickname?

18 A Yes, Fluffy.

19 Q When they were first here, did the defendant meet your
20 younger siblings?

21 A Yes, he did.

22 Q And did he interact with them?

23 A Yes, quite a bit.

24 Q And did he give Camilla any nicknames? Did the defendant
25 give Camilla any nicknames?

Daniela - direct - Penza

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1 A Yes. Yes, he called her Virgin Camilla.

2 Q And he was the one who came up with that?

3 A Yes.

4 Q Were there any other variations on Virgin Camilla?

5 A Yes, VC for Virgin Camilla.

6 Q Did Camilla also end up having an e-mail address that
7 played on Virgin Camilla?

8 A If I remember correctly, it was vcbaby@gmail.com.

9 Q As far as you know, when your sister come to the United
10 States, came to the Albany area, was she, in fact, a virgin?

11 A I thought so, yes.

12 Q During this second time, so not when they're going to
13 school, but when they're coming here not to go to school, how
14 old are they?

15 A They are, I think, like 15 and 16.

16 Q So Camilla 15 and Adrian 16?

17 A Uh-huh.

18 THE COURT: You have to answer yes or no.

19 A Yes, sorry.

20 Q When they got here, when they came here did you end up
21 being able to be in charge of what they were going to be
22 doing?

23 A No. They arrived in Albany and they -- so they were
24 spending time with us. It was summertime maybe. We were
25 playing tennis and walking together and spending alone time

Daniela - direct - Penza

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1 with them and Keith together almost like a family. But, no,
2 immediately after they moved, they -- my brother was living in
3 a house on a road called Twilight. They called it Twilight
4 House which is rather far away from Knox Woods.

5 And Cami also -- the plan that Keith had for her was
6 that she was going to be essentially Nancy's maid. She was
7 going to be cleaning Nancy's house for money and attending
8 Ethos classes and the house that they found for her was also
9 far away from where I lived. So, soon after they arrived in
10 the Albany area, I lost -- I felt like I lost control of them.
11 Like, I wasn't seeing them all the time. I wasn't in -- I
12 wasn't the one taking care of them.

13 Q Who was Adrian living with?

14 A They were other SPs. All male, I believe. At that time,
15 I can't say for sure, but it was the house where Mark Vicente
16 lived -- and Benjamin Meyers lived. I think Omar Boone lived
17 there. So it was all SPs.

18 Q What about where Cami lived?

19 A Cami lived in a house with other women. There was a
20 Mexican woman called Carmen Lucia who was taking Ethos for a
21 while. Megan Weaver. I believe Monica Duran was living there
22 at the time.

23 Q What was the age difference between the men who were
24 living with your brother and the women who were living with
25 Camilla?

Daniela - direct - Penza

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1 A At least, like, ten or fifteen years. My siblings were
2 babies compared to the rest of the people around.

3 Q Did Adrian have a job when he arrived?

4 A Not right away and Keith offered to teach him robotics
5 and some C++ programming or something like that, but it did
6 not pan out.

7 Q The defendant didn't teach him those things?

8 A No. He ended up getting a job cleaning the horses on
9 Clare's farm.

10 Q Did Clare do anything else for your brother?

11 A Yeah. I think that under the guise of helping him, she,
12 for example, purchased a car for him. That was very helpful,
13 really. He was able to get other work like that, but with a
14 huge amount of interest. So here it was, like, he was her
15 employee, a young guy -- boy really. And, you know, it seemed
16 like a favor at the time, but really it was very abusive.

17 Q Okay. And now Cami is here. She's 15 and her job is
18 cleaning Nancy's house?

19 A Yes.

20 Q What did you think about that?

21 A Again she was building ethos strategy. That was the
22 reasoning and it was supposed to be temporary. The truth is
23 that -- I mean, we came from a place where we weren't wealthy
24 but we were living a comfortable life. We had an education
25 and my parents were doing everything for us. It was a very

Daniela - direct - Penza

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1 huge contrast with a life that we were used to, to now, for
2 example, Cami being a maid. But it was presented as a really
3 good opportunity for her to spend time with Nancy. She was
4 prefect and developing some ethos strategies.

5 Q Looking back now, do you have any thoughts on the role
6 that Cami was given and where she was placed?

7 A Yes, I have some thoughts. What I think is, one, very
8 manipulative. She wasn't offered at any moment a work visa,
9 even though she was offered a job. That became a problem.
10 But also I think that -- I mean, Nancy's house was far away.
11 It was far away from me, from any of her other siblings. She
12 was very young. I think that she was isolated for easy
13 access.

14 MR. AGNIFILO: Your Honor, I'm going to object and
15 ask that that be stricken.

16 THE COURT: Overruled.

17 BY MS. PENZA:

18 Q Did you ever hear the defendant say anything sexual in
19 front of your sister Camilla?

20 A Yes.

21 Q Can you just describe?

22 A Yes, he would makes jokes about incest. He would make
23 the sexual jokes that he used to make around everybody else,
24 but he used to tease her about her innocent demeanor hence the
25 nickname Virgin Camilla. He used to make jokes about my dad

Daniela - direct - Penza

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1 being gay, was one of them, and things that were sexual in
2 nature.

3 Q Did you ever come to learn that the defendant was having
4 sex with your sister Camilla?

5 A Yes.

6 Q When did you first learn that?

7 MR. AGNIFILO: Your Honor, I object.

8 THE COURT: Overruled.

9 You may answer.

10 A It was -- some time before fall 2006.

11 Q How -- why do you have that frame of reference?

12 A I have that frame of reference and that certainty because
13 I had a conversation with Keith about that and after fall
14 2006, I never spoke to Keith again.

15 Q Can you describe the conversation that you had with the
16 defendant?

17 A Yes. I asked him if he was having sex with my sister.
18 He asked me if I minded.

19 THE COURT: I am sorry, which sister?

20 THE WITNESS: With Camilla. With my sister Camilla.

21 THE COURT: Go ahead.

22 A I asked him if he was having sex with my sister Camilla
23 and he replied if I minded and we had a conversation about,
24 two things, first of all, one -- and, well, about -- about him
25 having sex with her. But I also remember -- and I feel a lot

Daniela - direct - Penza

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1 of shame about this, but this is exactly how it happened. On
2 top of me being concerned about him having a relationship with
3 her, I was also feeling kind of jealous. I was thinking, oh,
4 he made me wait until after my 18th birthday and he's having
5 sex with my sister, you know, now. And it's all kinds of
6 messed up that I felt that way. And I really wish -- I deeply
7 regret that I didn't at that moment get my sister out of
8 there. But that's how it happened.

9 Q How did the defendant respond?

10 A He told me that there were some women, girls, that were
11 more mature, emotionally mature, than others. That I wasn't
12 particularly emotionally mature and that everyone was
13 different.

14 Q Did you ever have another conversation with the defendant
15 about him having sex with your sister while she was still
16 underage?

17 A Yes.

18 Q And this conversation would also have been before fall
19 2006?

20 A Yes. Yes. So, I had a conversation with him because I
21 had observed that my sister was having a really hard time.
22 She was -- I would say she was depressed. She was acting
23 really, like, somber -- like, dark. And she had, like, really
24 tendencies to self-destruct. So I went through her things
25 and --

Daniela - direct - Penza

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1 Q When you say tendency to self-destruct, what do you mean?

2 A She used a thing called cutting. So, it wasn't deep
3 wounds but it was surface wounds and would write very dark
4 poetry. It was just visible. She was wearing, like, really
5 raggy clothes. She didn't look good. It was very concerning
6 to me so I went through her stuff. And I found a document
7 that really alarmed me, a piece of paper that really alarmed
8 me. And it was a piece of paper that was sexual in nature. I
9 knew she was having a sexual relationship with Keith.

10 It said things like she was sexually unsatisfied.
11 It said things like she really wanted to have a baby. It
12 had -- it read of sexual bitterness. And I took that and I
13 brought it to Keith's attention and I brought it to him and he
14 told me that he was taking care of that and that I should just
15 put it back where I found it. And I did.

16 Q I'm showing you -- I'm sorry.

17 A And I did.

18 Q How do you feel about that now?

19 A I wish I hadn't done that. I wish I had done something
20 different. What happened is not right.

21 (Exhibit published.)

22 Q I'm showing you what's in evidence as Government Exhibit
23 915. Do you recognize this photo?

24 A Yes.

25 Q Do you know approximately when this photo was taken?

Daniela - direct - Penza

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1 A Yes, I think that would have been 2004, maybe.

2 Q And is this your whole family?

3 A Yes.

4 Q And can you just --

5 A From left to right, that's my dad, then Cami, then
6 Fluffy, Hector Adrian, my mom, Mariana and I am on the far
7 right.

8 Q Thank you.

9 (Exhibit published.)

10 Q Showing you what's in evidence as Government Exhibit 916,
11 do you know what this is?

12 A That's my sister Cami on her 15th birthday.

13 Q Is there something about this that indicates clearly that
14 it's her 15th birthday?

15 A The absurd amount of flour arrangements that my dad got
16 for her and she was also serenaded.

17 Q Is there something special that happens in the Mexican
18 culture?

19 A The word is *quinceanera* which is the closest similar
20 thing to Sweet 16, maybe, in the U.S. Typically in -- there's
21 a big festivity around that. In our family we don't do the
22 big dress or big photo shoot thing, but we certainly take it
23 very seriously.

24 (Exhibit published.)

25 Q I'm going to show you a series of pictures. Can you tell

Daniela - direct - Penza

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1 me when these were taken?

2 A Yes, that was taken around 2004 in Tampico.

3 THE COURT: That is 917?

4 MS. PENZA: I'm sorry.

5 THE COURT: I just need the number.

6 MS. PENZA: I'm sorry, Your Honor, Government
7 Exhibit 917 already in evidence.

8 BY MS. PENZA:

9 Q And who is in this photo?

10 A Cami is on the left. I am on the right.

11 (Exhibit published.)

12 Q Showing you what's in evidence as Government Exhibit 918.

13 A That is that same time around 2004, Tampico. Cami is on
14 the left and Fluffy is on the right.

15 (Exhibit published.)

16 Q Showing you what's in evidence as Government Exhibit 921?

17 A The same moment. That's my mother on the left and Cami
18 on the right.

19 (Exhibit published.)

20 Q Showing you what's in evidence as Government Exhibit 922.

21 A That is Cami on the left and my dad on the right.

22 (Exhibit published.)

23 Q Showing you what's in evidence as Government Exhibit 926.

24 A That is, from left to right, Cami, that's me, Fluffy, my
25 mom and my dad.

Daniela - direct - Penza

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1 Q And is this -- is Government Exhibit 926, did you
2 actually create this with Tampico 2004?

3 A Yeah. I made that in some kind of Photoshop-like
4 software.

5 (Exhibit published.)

6 Q Daniela, I'm showing you Government Exhibit 929. Can you
7 tell me who this is?

8 A That's my sister Camilla.

9 Q Thank you. Your Honor, I think --

10 THE COURT: I think we should adjourn for the week.

11 MS. PENZA: Thank you, Your Honor.

12 THE COURT: All right. The witness is excused.

13 We're going to continue on Tuesday morning at 9:30. You are
14 excused for the day. Do not discuss your testimony with
15 anyone.

16 (Witness steps down.)

17 (In open court.)

18 THE COURT: Members of the jury, one thing, when you
19 retire tonight you are going to get a new schedule. It will
20 indicate that we are not having trial on June 4th. So it has
21 one adjustment. You should have the up-to-date schedule and
22 just rip up the old schedule so you do not confuse things.
23 All right?

24 We are going to return on Tuesday after the holiday
25 weekend at 9:30 and I am going to remind you that it is very

Daniela - direct - Penza

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1 important that you follow my instruction that you not discuss
2 this case with anyone; not your family, friends or business
3 associates and not your fellow jurors. Also you must not
4 read, listen to, watch or access any accounts of this case on
5 any form of media including newspapers, TV, radio, podcasts or
6 the internet and you should not research or seek outside
7 information about any aspect of the case.

8 Please do not communicate with anyone about the case
9 on your phone whether through e-mail, text messaging or any
10 other means; through any blog or website or by way of any
11 social media including Facebook, Twitter, Instagram, YouTube
12 or any similar sites. You must not consider anything you read
13 or heard outside of this courtroom, whether you read it before
14 or during the jury selection process, or during the trial. Do
15 attempt to do any research or investigation about the case.
16 And do not visit any of the locations identified on the
17 questionnaire or discussed during the course of jury selection
18 or during the trial.

19 I want to thank you again on behalf of all the
20 parties for your attention this week and throughout the trial.
21 Have a good weekend. Have a good holiday. We will see you on
22 Tuesday at 9:30.

23 All rise, please.

24 (Jury exits.)

25 (Continued on the following page.)

Proceedings

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1 (Continuing.)

2 MS. HAJJAR: Just one thing. With consent from
3 defense, we would ask for an adjournment of our extension of
4 our time to file proposed jury instructions. They're due
5 tomorrow.

6 THE COURT: Yes, I know. We were just discussing
7 the possibility you would seek to do so.

8 Until when?

9 MS. HAJJAR: June 5 would work?

10 MR. AGNIFILO: It's fine with us, Judge.

11 THE COURT: That's fine.

12 MS. HAJJAR: Thank you, your Honor.

13 THE COURT: It's so ordered for both sides.

14 MR. AGNIFILO: Thank you, Judge.

15 THE COURT: Is there anything else?

16 MS. PENZA: Not that I know of.

17 THE COURT: Anything else?

18 MR. AGNIFILO: One second.

19 THE COURT: Please be seated in the back.

20 (Counsel confer.)

21 MS. PENZA: Yes, your Honor. I think on consent of
22 the defense, I know your Honor has been -- as with the last
23 witness, we would ask permission to be able to continue
24 meeting with Daniela over the weekend while she's still on
25 direct.

Proceedings

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1 THE COURT: Any objection to that?

2 MR. AGNIFILO: None from us.

3 THE COURT: All right. It's so ordered.

4 MS. PENZA: Thank you.

5 THE COURT: Anything else?

6 MR. AGNIFILO: Nothing else.

7 THE COURT: Thank you, everyone. Have a good
8 weekend.

9
10 (Matter adjourned until Tuesday, May 28, 2019, at
11 9:30 a.m.)
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I N D E X

WITNESS

PAGE

DANIELA,

DIRECT EXAMINATION BY MS. PENZA

2280

E X H I B I T S

Government Exhibits 912 to 923, 925, 926,
and 929

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Government Exhibit 1580

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Government Exhibit 1501

2403

Government Exhibits 1503 and 1505

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